I-280 TRANSFER CONCEPT PROGRAM

Draft Environmental Impact Report – Addendum

Summary of Comments and Responses

DEIR Publication Date: September 28, 1984
DEIR Public Hearing Date: November 15, 1984
DEIR Public Comment Period: October 15 to November 30, 1984

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M E M O R A N D U M

July 18, 1985

TO: Interested Parties and Policy Makers

FROM: Barbara W. Sahm, Environmental Review Officer Barbara Sahm sam

RE: Certification of I-280 Transfer Concept Program
Final Environmental Impact Report (EIR) - File No. 84.385E

This Draft Summary of Comments and Responses, in conjunction with the Draft EIR of September 28, 1984 and enclosed pages entitled Addendum for Comments and Responses, Revisions to Draft Environmental Impact Report and Developable Land Trade-Offs by Alternatives, constitutes the Final Environmental Impact Report for the I-280 Transfer Concept Program, as certified by the City Planning Commission on May 23, 1985.

Please find enclosed a copy of the certification motion.

For further information about this matter, please contact David Hood at (415) 558-5261.

Enclosures

BWS/DH/ms

City and County of San Francisco
Department of City Planning

450 McAllister Street
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Draft Environmental Impact Report

I-280 Transfer Concept Program

84.385E

ADDENDUM FOR COMMENTS AND RESPONSES

May 23, 1985

Draft EIR Publication Date:	September 28, 1984
Public Comment Period:	October 15, 1984 -- November 30, 1984
Public Hearing Date:	November 15, 1984
Certification Date:	May 23, 1985

IX. REVISIONS TO DRAFT ENVIRONMENTAL IMPACT REPORT

Page V-93, Table V-17, bottom of the page, correct errors under "STANDARDS" as follows:

"STANDARDS	1-hour	8-hour
Federal	35 ppm	9 ppm
State	20 ppm	9 ppm"

Page VII-3, paragraph three, in order to be consistent with the impact analysis on pages V-92 -- 97, rewrite as follows:

> "Though all alternatives would result in an overall improvement to regional air quality as compared to existing conditions and though no Federal air quality standards would be exceeded, using the freeway based methodology contained in this EIR results in violation of the State 1-hour average carbon monoxide standard for alternatives I, III, IV an VA. Selection of Alternatives II, IVA, V and VI would not violate these standards."

DEVELOPABLE LAND* TRADE-OFFS BY ALTERNATIVES

	China Basin		South Beach/ Rincon Hill		Ferry Building Area		Freed	Taken	Tot
Alternative II:									
Parcels (or portions of) Freed	None		SWL331-332	1.2	None		1.2		
Parcels (or portions of) Taken	AB3793-3796	2.7**	SWL332,334	1.2	SWL327 SWL3475.348	0.5 1.9		6.3	(5.1
Alternative III:									
Parcels (or portions of) Freed	AB3795	2.3	SWL331-332	1.2	AB3738-3741 AB140.141,165, SWL324 AB202-203	2.3 1.2 0.9	7.9		
Parcels (or portions of) Taken	AB3793-3798 AB3787	7.4 0.6	SWL332,334	1.2	SWL327 SWL347S,348	0.5 1.9		11.6	(3.7
Alternative IV:									
Parcels (or portions of) Freed	AB3795 AB3804-3805	7.0 14.3	SWL331-332	1.2	AB3738-3741 AB140.141,165, SWL324 AB202-203	2.0 1.2 0.9	26.6		
Parcels (or portions of) Taken	AB3795-3798	7.8	SWL332,334	1.8	SWL327 SWL347S,348	0.5 1.9		12	14.6
Alternative IVA:									
Parcels (or portions of) Freed	AB3795 AB3804-3805	7.0 14.3	None		AB140.141,165, SWL 324 AB202-203	1.2 0.9	23.4		
Parcels (or portions of) Taken	AB3794-3798	10.3	SWL334	1.2	SWL327 SWL347S,348	0.5 1.9		13.9	9.5
Alternative V:									
Parcels (or portions of) Freed	None		SWL331-332	1.2	AB140.141,165, SWL324 AB202-203	1.2 0.9	3.3		
Parcels (or portions of) Taken	AB3794-3797	9.6	SWL329-334 AB3768,3772 AB3789	2.3 1.7 0.2	SWL327 SWL347S,348	0.5 1.9		16.2	(12.9
Alternative VA:									
Parcels (or portions of) Freed	None		SWL331-332	1.2	AB140.141,165, SWL324 AB202-203	1.2 0.9	3.3		
Parcels (or portions of) Taken	AB3794-3797	9.6	SWL332,334	1.4	SWL327 SWL347S,348	0.5 1.9		13.4	(10.1
Alternative IV:									
Parcels (or portions of) Freed	None		SWL331-332	1.2	None		1.2		
Parcels (or portions of) Taken	AB3794-3797	9.6	SWL329-334 AB3768,3772 AB3789	2.3 1.7 0.2	SWL327 SWL347S,348	0.5 1.9		16.2	(15)

* Parcels of less than 3,000 square feet (0.07 acre) or less than 15,000 square feet without access are considered undevelopable and therefore are not included in the table.

** Parcel size in acres.

DH:eh
July 9, 1985/6094B

File No. 84.385E
Address: I-280 Transfer Concept Program

SAN FRANCISCO

CITY PLANNING COMMISSION

MOTION 10320

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR THE I-280 TRANSFER CONCEPT PROGRAM.

MOVED, That the San Francisco City Planning Commission ("Commission") hereby CERTIFIES Final Environmental Impact Report identified as case file No. 84.385E: "I-280 Transfer Concept Program" based upon the following findings:

1) The City and County of San Francisco, acting through the Department of City Planning ("Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 et seq., "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et. seq., "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code ("Chapter 31").

a. The Department, in conjunction with the California Department of Transportation (CALTRANS) and the Metropolitan Transportation Commission (MTC) (hereafter referred to as the "joint agencies"), determined that an EIR was required, to assess impacts of project elements in various combinations, and CALTRANS filed a "Notice of Preparation of DEIR" with the State Clearinghouse, pursuant to State CEQA Guidelines, Section 15082(d), on January 21, 1983.

b. On September 28, 1984, the Department, CALTRANS and MTC jointly published the Draft Environmental Impact Report ("DEIR") and provided public notice on October 12, 1984 in a newspaper of general circulation of the availability of DEIR for public review and comment period through November 30, 1984, and of the date and time of the public hearing on the DEIR; the notice was mailed to CALTRAN'S list of persons requesting such notice.

c. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site by San Francisco Public Utilities Commission staff on October 14 and 15, 1984.

d. On September 28, 1984, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to other government agencies.

2) The joint agencies held a duly advertised public hearing on said Draft Environmental Impact Report on November 15, 1984, at which opportunity was given for, and public comment received on, the DEIR.

3) The joint agencies prepared responses to comments on environmental issues received at the public hearing and in writing during the public review period, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a "Draft Summary of Comments and Responses," published in April, 1985, was distributed to the Commission and to all parties who commented on the DEIR, and was available to others upon request at Department offices.

4) A Final Environmental Impact Report has been prepared by the City based upon the Draft Environmental Impact Report, any consultations and comments received during the review process, any additional information that became available, and the Summary of Comments and Responses, all as required by law.

5) Project Environmental Impact Report files have been made available for review by the City Planning Commission and the public and these files are part of the record before the Commission.

6) On May 23, 1985, the Commission reviewed the Final Environmental Impact Report and found that the contents of said report and the procedures through which the Final Environmental Impact Report was prepared, publicized and reviewed comply with the provisions of the California Environmental Quality Act, the Guidelines of the Secretary for Resources and Chapter 31 of the San Francisco Administrative Code.

7) The City Planning Commission hereby does find that the Final Environmental Impact Report concerning 84.385E: "I-280 Transfer Concept Program" is adequate, accurate and objective, and that there are no significant revisions to the Draft Environmental Impact Report, and hereby does CERTIFY THE COMPLETION of said Final Environmental Impact Report in compliance with the California Environmental Quality Act and the State Guidelines.

8) The Commission, in certifying the completion of said Final Environmental Impact Report, hereby does find that the proposed project to be presented to the Planning Commission for consideration and approval will have significant effects on the environment as follows:

- Noise would increase under several alternatives. The most significant increase would be in Alternatives V and VI along the at-grade PCS extension route. Though this impact would not be significant for existing uses, proposed residential areas, such as the Rincon Point/South Beach Redevelopment area, would be adversely impacted. The proposed 6-foot-high noise barrier would not significantly reduce noise levels. If selected, the impacts of these alternatives are not considered mitigable. Selection of other alternatives constitutes a major mitigation measure. Under Alternatives III through VI, minor interference with activities in the Aquatic Park area would be expected during LRV passbys. In Alternative II a new noise source from the E-Line bus would be introduced to Bay Street between Van Ness Avenue and Laguna Street. Selection of other alternatives will mitigate the impacts associated with Alternatives II and III-VI.

- No residences would be displaced for any alternative except for Alternative I. However, all alternatives would result in displacement of businesses. Business displacement would vary depending on the alternatives as follows: Alternative VA, 73 businesses; Alternative V, 22 businesses; Alternative VI, 20 businesses; Alternative IV, 12 businesses;Alternative IVA, 11 businesses; Alternatives II and III, 9 businesses; and Alternative I, no businesses. Selection of Alternatives I and VA (which includes joint development opportunities) are the only alternatives which mitigate business displacement impacts.

- Change of visual quality along the at-grade PCS extension from the 6-foot sound barrier wall (Alternatives V and VI) is considered a

major adverse impact. All other alternatives mitigate this impact. In particular, Alternative VA mitigates this impact by retaining the PCS extension as a design component, but undergrounding it along its entire length. The above-grade pedestrian crossing design options of Alternative IVA would have an adverse visual impact on the Ferry Building/Justin Herman Plaza and the Fourth and Townsend SP Depot areas. Views would be affected from the street level and second-story windows along the project corridor. This impact can be mitigated by use of an underground crossing--also an Alternative IVA design option--or an at-grade crossing.

- Energy, in the form of electricity and fossil fuels, would be required for the operation of public transit facilities. However, compared to Alternative I (the No Project Alternative), a net decrease in consumption of operational energy would occur for Alternatives III-VI. Selection of Alternatives III-VI thus mitigates the operational energy consumption of the 'do-nothing' alternative.

- Removal of the Embarcadero Freeway (Alternatives III-VA) would increase peak period congestion on surface streets in the Embarcadero Corridor. The extent of congestion for each alternative varies depending upon the extent of mitigating traffic improvements (e.g., new ramps to the Embarcadero roadway). Street congestion would also affect transit operations. Impacts on surface street performance would be largest for Alternative III, followed by Alternative IV. Alternatives IVA, V and VA would all have similar street performances, and would mitigate the impacts of Alternatives III and IV.

- Increased interface between rail (E-Line, F-Line, Peninsula Commute Service extension) and non-rail vehicles in Alternatives III-VI would adversely affect traffic flow along the Embarcadero roadway and occasionally reduce traffic speed. These impacts are unavoidable.

- Alternatives III, V, and VA would adversely impact existing Muni Metro subway capacity levels, due to the combination of the Muni Metro extension and the turnback facility. Selection of other alternatives would actually enhance subway capacity. Alternatives IV and IVA provide the greatest expansion in capacity.

- Parking spaces would be lost throughout the project corridor. Number of parking spaces lost would range from 80 spaces in Alternative I to 1,650 spaces in Alternative IVA. While loss of spaces is unavoidable, varying degrees of mitigation can be achieved through selection of an alternative.

- Historical resources would be both visually and physically affected (see Chapter VI). Direct physical impacts on historic structures would occur only in Alternative VA on the site of the downtown Peninsula Commute Service depot adjacent to the Transbay Terminal. Selection of other alternatives mitigates these impacts.

- While the exact nature and location of archaeological sites are unknown, there is a high probability that some archaeological resources could be affected. Impacts would likely occur during excavation for the Peninsula Commute Service or Muni Metro extensions. To insure protection of archaeological resources, an archaeologist will observe construction activity, and "time buffers" will be built into construction contracts to allow time for any archaeological salvage operations. Selection of Alternative I is the only measure that ensures absolute mitigation of adverse impacts on archaeological resources.

- Though all alternatives would result in an overall improvement to regional air quality as compared to existing conditions and though no Federal air quality standards would be exceeded, using the freeway based methodology contained in this EIR results in potentially significant effects in that the State 1-hour average carbon monoxide (CO) standard would be violated for alternatives I, III, IV and VA. Selection of Alternatives II, IVA, V and VI would not violate these standards and, thus, would not result in a potentially significant effect for CO.

- Energy in various forms would be required for the construction of the various alternatives. Construction energy requirements would range from 2.5 million barrels of oil (Alternative VA) to .37 million barrels of oil (Alternative II). Energy consumption is only mitigable if no construction is undertaken (i.e., if Alternative I is selected).

The Commission further finds that impacts during the construction phase of the proposed project would not be significant because of their temporary natures, such as noise, removal and replacement of vegetation, and disruption of business, residential and recreational uses.

I hereby certify that the foregoing Motion was ADOPTED by the City Planning Commission at its regular meeting of May 23, 1985.

Lee Wood, Jr.
Secretary

AYES: Commissioners Bierman, Karasick, Klein, Rosenblatt, Salazar and Wright

NOES: None

ABSENT: Commissioner Nakashima

ADOPTED: May 23, 1985

DH:eh
5799B

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I. INTRODUCTION

This Addendum to the I-280 Transfer Concept Program Draft Environmental Impact Report of September 28, 1984, contains written comments on the DEIR received during the public comment period (October 15 through November 30, 1984) and testimonies taken at the public hearing on the DEIR (November 15, 1984), pursuant to the California Environmental Quality Act. Responses to the comments are also contained in this Addendum.

This Addendum, together with the DEIR, will be considered by the City and County of San Francisco, and certified as a Final EIR for City purposes if deemed adequate. The State, as Lead Agency, will subsequently process a Final EIR, which may include additional information, in accordance with Caltrans procedures established under the California Environmental Quality Act.

The I-280 Transfer Concept Program is a program of transportation improvement concepts for the I-280/Embarcadero Corridor in the northeastern waterfront of San Francisco. The I-280 TCP study is a "system planning" study of the interrelationship among various elements of the total transportation system in the corridor and their overall impacts on the corridor, in contrast to a "project-level" study. As such, the DEIR addresses impacts and mitigations of the alternatives at the "system" level rather than at the "project" level. The information presented in the DEIR, together with the comments and responses contained in this Addendum, will be considered by local decision makers in the selection of individual projects for further development and implementation. Upon a local decision on preferred projects, each selected project will be subject to detailed design development, implementation planning, and a project-level environmental clearance. Depending upon the nature and potential funding sources of a selected project, the project-level environmental clearance may include the preparation of a project EIS/EIR pursuant to applicable government regulations. Those affected by a selected project, as well as the general public, will have an opportunity to participate in the project development and environmental clearance process before the projected is implemented.

Some 287 comments were received in 45 letter (or cards) and from 17 persons testifying at the November 15 joint public hearing. In most cases a commentator

made several comments covering different aspects of the DEIR. Twelve persons testifying at the hearing also submitted written comments. The majority of comments were received from special interest groups and individuals representing themselves. The following is a breakdown by commentator category.

Commentator Category	Number of Commentators	Number of Comments
Individuals	16	73
Special Interest Groups	36	184
City/County Agencies	5	19
Regional Agency	1	3
State Agencies	2	3
Federal Agencies	2	5
	62	287

The majority of comments relate to traffic impact and transportation services. There were a few comments on conceptual design of alternatives and urban design related issues. There were also quite a number of comments which were in the nature of position statements. The remaining comments cover economic, fiscal, environmental, social impacts, presentation of the DEIR material and the EIR process. An approximate distribution of areas of interest reflected in the comments is as follows. It should be recognized that a number of comments covered several areas and consequently an exact characterization by area is not possible.

Comment Area	Approximate No. of Comments
Traffic Impact	80
Transportation Services	75
Conceptual Design	14
Urban Design	18
Economic, Fiscal, Environmental, Process	43
Position Statement	57
	287

Comments received on the DEIR generally fall into six categories: (1) position statement or preference of the commentator, (2) questions regarding DEIR contents, (3) suggestions/proposals advanced by the commentator, (4) comments concerning the accuracy of data and findings included in the DEIR, (5) requests for changes/modifications in DEIR contents, and (6) requests for additional information not covered in the DEIR. An approximate distribution by comment group is as follows:

Comment Group	Approximate No. of Comments
1. Position Statements	57
2. Questions	29
3. Suggestions/Proposals	43
4. Comments on DEIR Accuracy	43
5. Request for Changes/Modifications	72
6. Request for Additional Information	43
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Comments in Group 1 are in most cases responded to with "comment noted". Questions are responded to based on existing information. Additional information was also provided where necessary to clarify the responses. It is not in the scope of the DEIR to study proposals advanced by commentators during the public review period. However, qualitative evaluations are provided where appropriate. Suggestions and proposals are noted in the responses for consideration by the decision makers and in preliminary and final design of the selected projects. Comments on DEIR accuracy are fully responded to based on existing and additional information. Request for Changes/Modifications in DEIR Contents are noted in the responses. Where appropriate, revisions to the DEIR are provided in the responses and summarized in Sec. IX, Revisions to Draft Environmental Impact Report. For those requests deemed inappropriate, reasons for not responding are given. A number of commentators requested additional information which is already covered in the DEIR. In these instances, appropriate citations and additional supplementary information are provided in the responses. Requests for detailed project-level information are referred to subsequent project design and environmental clearance for selected projects.

Comments and responses are grouped by category of commentator as follows: Federal Agencies (F), State Agencies (S), Regional Agency (R), City/County Agencies (C), Special Interest Groups (G), Individuals (I), and Persons Testifying at the Public Hearing (P). No significance is attached to the order in which each group appears in this Addendum.

Within each category, each document (letter, card or other form of submittal received) is numbered serially on its first page in the upper right-hand corner; that is, F-1, F-2; followed by S-1, S-2; R-1; C-1, C-2, etc. G-1, G-2, etc; and son on. Where documents contain more than one comment, these are numbered serially in the left-hand margin.

The corresponding responses appear immediately after the commentator's document or page from the public hearing transcript. Responses are labelled with the document or transcript page number and comment number in the order they are shown on the document. For example, if there were 3 comments on the first document in the "Individuals" category, the responses are labelled I-1.1, I-1.2, and I-1.3.

In addition to the responses to requests for changes/modifications in DEIR contents, several other changes have been initiated by the study team to correct minor errors or omissions in the DEIR. All revisions to the DEIR are summarized in Sec. IX, Revisions to Draft Environmental Impact Report, of this Addendum.

II. COMMENTS AND RESPONSES - FEDERAL (F)

DEPARTMENT OF THE ARMY
SAN FRANCISCO DISTRICT, CORPS OF ENGINEERS
211 MAIN STREET
SAN FRANCISCO, CALIFORNIA 94105

October 25. 1984

Environmental Branch

To: Mr. William Chastain
Caltrans
P.O. Box 7310
San Francisco, California 94120

Subject: Final Environmental Impact Report for the I-280 Transfer Concept Program

Your request for comments from this office was received on October 15, 1984 by your notice dated September 28, 1984.

1 The proposed construction project may require Department of the Army Authorization under Section 10 of the River and Harbor Act of 1899 and/or under Section 404 of the Clean Water Act. A copy of our pamphlet "U.S. Army Corps of Engineers Permit Program, A Guide for Applicants", is enclosed. For additional information please contact our Regulatory Functions Branch at 415-974-0418.

Any impacts on wetlands, threatened or endangered species, other valuable fish and wildlife resources, or on cultural resources are among the important environmental considerations for all Corps permit applicants.

Questions concerning our environmental review can be referred to Jerry Donaldson at 415-974-0392. Thank you for including us in your review process.

Sincerely,

Jerry Donaldson

for Roderick A. Chisholm, II
Chief, Environmental Branch
Planning/Engineering Division

RESPONSE TO COMMENT LETTER F-1

F-1.1: The possible requirement of Corps of Engineers permit for project construction under applicable federal regulations, is acknowledged. Upon a local decision on preferred projects, each project selected for implementation will be subject to further environmental review and clearance. If deemed applicable, Corps of Engineers permits for construction of affected projects will be sought following the established permit application process.

United States Department of the Interior
NATIONAL PARK SERVICE
GOLDEN GATE NATIONAL RECREATION AREA
FORT MASON, SAN FRANCISCO, CALIFORNIA 94123

IN REPLY REFER TO:
L76 (WR-GOGA)

November 28,1984

Mr. William Chastain
Caltrans
P.O. Box 7310
San Francisco, Ca. 94120

Dear Mr. Chastain:

The staff of the Golden Gate National Recreation Area has reviewed the draft EIR on the I-280 Transfer Concept Program and we have the following comments. We welcome all transit improvements to the San Francisco northern waterfront. The project of greatest concern to us in the draft EIR is the proposed MUNI E-Line.

1

We strongly support the implementation of the E-Line, using the rail system from the S.P. Depot, through the Fort Mason tunnel, terminating on the west side of Fort Mason, as described in Alternatives III and IV. The high visitor use of the Fort Mason Center will continue to generate a year-round demand for public transit to this destination.

2

Both the MUNI Five Year Plan and the General Management Plan for the GGNRA call for utilizing a rail system for the E-Line. Since the existing tracks extend as far west as the Presidio, bringing the E-Line to Fort Mason is an important link in what could eventually be a continuous rail line from the Bay Bridge to the Golden Gate Bridge.

3

Although, as the EIR states, local traffic may be impeded by the E-Line, this will be at least partially offset by an increase in use of public transit which would occur with improved service along the northern waterfront. We are concerned with the potential visual, historic and safety impacts addressed in the EIR, however we feel that with careful and sensitive planning and design these impacts can be avoided or mitigated. Working with both the State Historic Preservation Office and the Advisory Council under Section 106 proceedings should resolve the issue of impacts to historic resources. National Park Service staff is available to work with MUNI toward the resolution of the safety

4

issue at Aquatic Park, use of the Fort Mason Tunnel and construction of a turnaround on the west side of Fort Mason. We look forward to the implementation of this project.

Sincerely,

John H. Davis

John H. Davis,
General Superintendent

RESPONSE TO COMMENT LETTER F-2

F-2.1: GGNRA's expressed interest in transit improvements to the San Francisco northern waterfront is noted.

F-2.2: GGNRA's strong support for the Muni E-Line as described in Alternatives III and IV is noted.

F-2.3: Comment noted. As stated, the proposed E-Line rail service is consistent with both the Muni Five-Year Plan and the General Management Plan for the GGNRA.

F-2.4: As stated, potential visual, historic and safety impacts of the proposed E-Line on the northern waterfront can be mitigated or avoided with careful and sensitive planning and designs. When selected for implementation, project-level mitigation measures, including access control, speed control, landscaping, etc., would be investigated and incorporated into project design and operations plan. These mitigation measures will be planned in compliance with 106 procedures and 4(f) requirements. National Park Service staff's availability to work with Muni for the resolution of these issues is noted.

III. COMMENTS AND RESPONSES - STATE (S)

STATE OF CALIFORNIA—RESOURCES AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF FISH AND GAME
1416 NINTH STREET
SACRAMENTO, CALIFORNIA 95814
(916) 445-3531

October 23, 1984

Mr. Russell D. Sayre
Project Manager
Post Office Box 7310
San Francisco, California 94120

Dear Mr. Sayre:

1 The Department of Fish and Game has reviewed the I-280 Transfer Concept Program Draft EIR, SCH #83012509, and we do not believe this project will have any significant adverse effects on fish and wildlife resources. There are no rare or endangered species involved in this study area.

Sincerely,

Pete Bontadelli
for Jack C. Parnell
Director

RESPONSE TO COMMENT LETTER S-1

S-1.1: Comment noted. As stated by the commentator, there are no rare or endangered species involved in the study area.

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION
30 VAN NESS AVENUE
SAN FRANCISCO, CALIFORNIA 94102-6080
PHONE: (415) 557-3686

November 30, 1984

Mr. William Chastain
CalTrans
P. O. Box 7310
San Francisco, California 94120

SUBJECT: Draft Environmental Impact Report for the I-280 Transfer Concept Program (SCH #83012509)

Dear Mr. Chastain:

The BCDC staff has reviewed the DEIR for the I-280 Transfer Concept Program, and we have the following comments.

1 The discussion of the Commission on page VII-11 adequately summarizes the Commission's permit authority and jurisdiction, its major concerns, and the possible need for BCDC permits for various projects under consideration for the San Francisco waterfront. You should also be aware, however, that any transportation project built to or along the Bay may have a direct effect on the coastal zone in the terms of the federal Coastal Zone Management Act, and the projects and the funding grants for them may, therefore, be subject to the consistency requirements of that law and review by BCDC.

2 Given the level of detail of the various alternative projects considered in the program, the DEIR appears to address the impacts of the projects on the Bay, shoreline uses and the Commission's Special Area Plan adequately. Some impacts about which the Commmission would be concerned cannot, of course, by fully reviewed until we know more about alignments, construction schedules and other details of the proposed projects. Most important among the concerns we might have in future review of more detailed proposals would be impacts on public access and on water-oriented uses on waterfront.

Thank you for the opportunity to comment on this DEIR.

Very truly yours,

PHILIP E. KERN
Senior Planner

cc: State Clearinghouse
Resources Agency

PEK/lt

RESPONSE TO COMMENT LETTER S-2

S-2.1: Comment noted. The possible consistency requirements of the federal Coastal Zone Management Act are acknowledged. Individual projects selected for implementation are subject to project-level environmental clearance by affected government agencies. During the process, more detailed information on project effects on the coastal zone will be provided for BCDC review and determinations.

S-2.2: Comment noted. As a system level study, project-level details are yet to be developed and project-level impacts to be delineated. The project-level environmental clearance for selected projects will provide more detailed information, including impacts on public access and on water-oriented uses on the waterfront, for future review by BCDC.

IV. COMMENTS AND RESPONSES - REGIONAL (R)

ABAG
ASSOCIATION OF BAY AREA GOVERNMENTS

MetroCenter
Eighth & Oak Streets
Oakland
(415) 464-7900

Mailing Address:
P.O. Box 2050
Oakland, CA 94604

November 29, 1984

W. B. Chastain
Caltrans
P. O. Box 7310
San Francisco, CA 94120

RE: DEIR: I-280 Transfer Concept Program

Dear Mr. Chastain:

Thank you for the opportunity to comment on this document. The following staff comments reflect general concerns expressed by many locally elected Bay Area officials as embodied in ABAG's Regional Plan 1980. ABAG's Executive Board has not taken a position on this document, nor on the proposed project. 1

In the I-280 Transfer Concept Program, Caltrans and MTC have developed six main alternatives and two subalternatives as substitute projects for the segment of San Francisco's northeastern waterfront originally planned for a link between I-280 and the Embarcadero Freeway and the Bay Bridge. Public opposition resulted in this 1.4 mile connection being withdrawn from the interstate system. The primary goal of this study was to develop alternatives consistent with regional and local transportation and land use policies for selection of a preferred alternative by the City and County of San Francisco. Each alternative evaluated in the DEIR consists of several elements. The evaluation concludes that each treatment of each element of each alternative has certain individual advantages and disadvantages. The ultimate locally preferred alternative will most likely consist of a selection of components from several alternatives. Our staff finds that the DEIR discusses issues of concern to ABAG in sufficient detail to aid in this selection. 2

ABAG comments on the interrelationships between jobs, housing and transportation in relation to adopted policies will be forthcoming when the final selection has been made and projects proposed to implement the various elements are submitted for review. 3

Please call me if you have any questions about these comments. My direct line number is 464-7953.

Sincerely,

Yvonne San Jule

Yvonne San Jule
Planning Coordinator

RESPONSE TO COMMENT LETTER R-1

R-1.1: Comment noted

R-1.2: Comment reflects a clear understanding of the DEIR objective and the study process. As stated, the locally preferred alternative will most likely consist of a selection of components from several alternatives. The DEIR discusses system-level issues related to the I-280/Embarcadero corridor to aid in this selection.

R-1.3: Same response as R-1.2. ABAG comments will be requested on the interrelationships between jobs, housing and transportation in relation to adopted policies when the final selection has been made and projects proposed to implement the various elements of the Concept Program are submitted for review.

V. COMMENTS AND RESPONSES - CITY AND COUNTY (C)

City and County of San Francisco

Recreation and Park Department

RECEIVED
NOV 23 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

November 14, 1984

Mr. Alec Bash
Environmental Review Officer
Department of City Planning
450 McAllister Street
San Francisco, CA 94102

RE: I-280 Transfer Concept
Program 84.385 ENLA

Dear Mr. Bash:

The I-280 Transfer Concept Program EIR presents numerous alternatives for the removal of the Embarcadero Freeway and the improvements that would then be made along the Embarcadero Corridor.

1 This is no indication in the E.I.R. as to which alternative is preferred or will be selected.

2 It is clear that several of the alternatives would create permanent adverse impacts to parkland under the jurisdiction of the Recreation and Park Department by the insertion of a transportation corridor through a park.

3 The EIR should make it clear that development and construction impacts that take place on park property must be approved by the Recreation and Park Commission. A taking of parkland for transportation purposes must first be approved by the Recreation and Park Commission and then be put to a vote of the public.

The attached comments are directed to specific points made in the EIR.

The Recreation and Park Department is eager to work with the I-280 Transfer Concept Program in developing the Embarcadero Corridor.

Thank you for this opportunity to comment on the I-280 Transfer Concept Program.

Very truly yours,

Tom Malloy
General Manager

TM/DL:dls

McLaren Lodge, Golden Gate Park San Francisco 94117

Recreation and Park Department Comments
on the I-280 Transfer Concept Program

4 Page VI-16 -Refers to the Rowing Clubs as private clubs - actually the clubs are open to the public and are sited on land under jurisdiction of the Recreation and Park Department.

5 Page VI-20 -The area north of Justin Herman Plaza is described but not identified. It is commonly called Embarcadero Park and it, as well as Justin Herman Plaza, are under the jurisdiction of the Recreation and Park Department.

6 Page VI-26 -The proposed Muni E-Line would travel directly in front of the rowing clubs. The passage of the trolley may impact easy access to the rowing clubs and the impact of vibrations from the trolley on the structures might also be considered. As indicated in figure VI-8 the E-Line terminus would be sited directly in front of the rowing clubs.

7 Page VI-29 -Alternatives IV, IVA in proposing a transit turnaround loop beneath Justin Herman Plaza would result in a considerable disruption of the use of the area during the 9-12 month construction period. This development on Park property must be approved by the Recreation and Park Commission.

8 Page VI-29 -Alternatives IV, V, VA and VI propose the installation of the F-Line trolley across a portion of Justin Herman Plaza (Market Street extension). The taking of parkland for this purpose, would, under the dictates of the City Charter, be decided by a vote of the citizenry. Other alternatives wherein the trolley line would not disrupt Parkland would be preferable. As stated in the EIR the options involving construction of an elevated Pedestrian Bridge across Justin Herman Plaza and the F-Line through the Plaza would create long term adverse impacts.

RESPONSE TO COMMENT LETTER C-1

C-1.1: The purposes of the DEIR do not include a recommendation for a preferred alternative. The locally preferred alternative will be selected by decision-makers based on the information presented in the DEIR and will most likely consist of a selection of components from several alternatives. The DEIR discusses issues of concern to the decision-makers, as well as the public, in sufficient detail to aid in this selection.

C-1.2: Elements of several alternatives would impact parklands under the jurisdiction of the Recreation and Park Department. The potential impacts on parklands and possible mitigation measures were discussed in Section VI.C: Parkland Resources, of the DEIR.

C-1.3 On page VII-14 of the DEIR, the following material is inserted after the first partial paragraph and before "2. Relationship to Plans:"

"Development and construction impacts that take place on property under the jurisdiction of the San Francisco Recreation and Park Department, such as Aquatic Park or Justin Herman Plaza, are subject to approval by the Recreation and Park Commission."

Use of city parkland for transportation purposes must be approved by the Recreation and Park Commission; however, it does not necessarily require a vote of the public. In a related legal opinion of the City Attorney (Opinion No. 81-6, February 13, 1981), the City Attorney cites a previous court opinion on the permissible use of parklands for streetcar tracks. Excerpts from Opinion 81-6, relevant to this comment, are attached for reference. A copy of the full text of that Opinion is available from the City Attorney's Office, City Hall, or from the Department of City Planning, 450 McAllister Street.

C-1.4 On page VI-16, first paragraph, fourth line, the words "public rowing" are substituted for "private."

C-1.5 On page VI-20, third full paragraph, third line, after the word "Plaza" add "(known as Embarcadero Park)." The following sentence is added to the end of this paragraph: "Both Justin Herman Plaza and Embarcadero Park are under the jurisdiction of the Recreation and Park Department."

C-1.6 The location of the E-Line terminus and rails could affect ease of access to the rowing clubs, depending on terminus design, frequency of trolly passby and the frequency and number of people using the clubs. If the proposed E-Line is selected for implementation, final design would take these factors into consideration by Muni.

Vibration caused by train passbys has been mitigated successfully by the design of resiliently mounted track. This technique differs from the traditional technique of rigidly connecting the tracks to a concrete base. Rigid construction easily transmits vibration to adjacent buildings, whereas resilient track designs reduce vibration transmission. These designs basically fall into two categories, distinguished by the method used to support the rails: ballast-based track and slab-based track. The rails can be isolated from the slabs by supporting them with a mastic asphalt cushion poured beneath the rails after they have been set to alignment and level. In practical terms, the resulting vibrations would be similar to those of other surface traffic (i.e., cars, trucks, buses). The use of mastic and/or of other methods would be relatively expensive. Although vibration levels are not expected to be significant, detailed engineering analysis will be done if the project is to be built. If this is shown to be a serious problem, methods will be implemented to reduce the vibration levels below background levels. (Luther Freeman, Transit Planner (TAC Member), Muni, telephone communication, 20 January 1985.) The following sentence is added to the last paragraph on page V-129: "Where found to be necessary, resiliently mounted tracks should be considered to mitigate the vibration impact of streetcar."

C-1.7 Comment noted. See Response to Comment C-1.3 above.

C-1.8 Comment noted. See Response to Comment C-1.3 above.

purposes. The principles and holdings set forth in those authorities provide the means by which to determine whether the proposed sewer project constitutes an abandonment or discontinuance of park property for park uses which is prohibited by Section 7.403(a) absent compliance with the procedures set forth in that subsection. If such an abandonment or discontinuance would occur, the project is unlawful absent a charter amendment. If the proposed project would not constitute an abandonment or discontinuance of park property from park uses, the use of park property for the project would be lawful.

Several principles are discernible from a review of decisions regarding lawful uses of park property. First, if the proposed project does not directly promote recreational use of the property, it will not be allowed if it would withdraw from public use a substantial portion of the park. Thus the following uses have been held unlawful: a school (McCullough v. Board of Education (1876) 51 C. 418); a street (Mulvey v. Wangenheim (1913) 23 C.A. 268); town hall and jail (Kelly v. Town of Hayward (1923) 192 C. 242); street which would withdraw 60% of park (Hall v. Fairchild-Gilmore-Wilton Co. (1924) 66 C.A. 615); a street which would result in material defacement of park property (Olmstead v. City of San Diego (1932) 124 C.A. 14). See also Spires v. City of Los Angeles (1906) 150 C. 64, in which the court held that a library was consistent with park purposes but that the library could not be used for general municipal administrative purposes and stated, in dicta, that a city hall, fire station, hospital and jail would be prohibited because inconsistent with park purposes.

In addition, this office has advised that the following uses may not lawfully be made of park property: an office for the California Centennial Commission and a schoolhouse (No. 48-4088); a blood bank (49-67); parking lot (No. 50-110); and a drill tower (No. 50-144).

A second general principle which can be discerned from decisions concerning the lawful use of park property is this: a use which is beneficial to the public is permissible, even if it only tangentially promotes park uses, so long as the use is not substantially disruptive of park uses.

Thus in Humphreys v. San Francisco (1928) 92 C.A. 69, the court considered whether the City could lawfully use portions of two parks for streetcar tracks. The use of one park was totally subsurface and the court had little trouble concluding that subsurface use alone would not be inconsistent with use of the property for park purposes. However, the project required abandonment of a narrow strip of property along one border of the

second park about 16 feet wide and 220 feet long. The opinion states that the "expressed purpose" of the streetcar project was to facilitate transportation between the downtown area of the City and the area known as the Sunset, but notes that it would

> "incidentally and to some extent at least be a medium of ingress, egress, and transportation, adding to the full enjoyment by the public of the privilege of the park."

Id. at 78. The court concluded that the streetcar project was "not so inconsistent" with park purposes "as to constitute an unlawful use thereof." Id.

Several other decisions come within this same category of permissible uses which are only tangentially related to park purposes. In Simons v. City of Los Angeles (1976) 63 C.A.3d 455, 133 C.R. 721, the court held that use of a park for a facility devoted to the training of police recruits was not inconsistent with use of the property for park purposes.[2]

The Attorney General has advised that use of a state park for the installation of a television or frequency modulation station is lawful if it would "tend to further public enjoyment and recreation" and would not "interfere with the use of the area for park purposes." 7 AG 75.

Similarly, this office has advised that the following uses of park property are lawful: use of the perimeter of a park for sidewalks, notwithstanding that they would be used by park-users and nonpark-users alike. (No. 41-3251); police station and emergency hospital station in park of large size (49-67); and footings of pedestrian bridge which would provide better access to park (No. 69-21).

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[2] It is unclear why the court in Simons considered whether the use of the park for police training constituted a diversion from the uses for which the park was dedicated since the property in question was publicly dedicated park property and the City Charter had been amended to allow use for a police training facility. As noted above, absent restrictions in its Charter, a city is free to use park property for any use it considers appropriate, even if those uses are nonpark uses.

City and County of San Francisco
Department of City Planning

450 McAllister Street
San Francisco, CA 94102

ADMINISTRATION
(415) 558 - 5111 / 558 - 4656
CITY PLANNING COMMISSION
(415) 558 - 4656
PLANS AND PROGRAMS
(415) 558 - 4541
IMPLEMENTATION / ZONING
(415) 558 - 3055

November 28, 1984

William Chastain
Caltrans
P.O. Box 7310
San Francisco, CA 94120

Dear Mr. Chastain:

City Planning Commissioner Sue Bierman, has provided comments to Department of City Planning staff regarding the I-280 EIR. These comments should be addressed in the Final EIR. They are as follows:

1 1. The EIR should identify which parcels (or portions of parcels) would be either freed up for private development or acquired by public agencies under the various alternatives.

2 2. If removing the Embarcadero Freeway frees up a significant number of parcels for private development, how would that affect future transit and traffic demand forecasts?

The San Francisco Recreation and Parks Department staff and the Embarcadero Citizens Committee forwarded to us their comments on the I-280 Concept Program EIR. We are transmitting them to you as comments for response in the Final EIR.

3 During our review of the public comments received on the adequacy of the Rincon Hill Plan EIR, it was noted by the San Francisco Chamber of Commerce that the Rincon Hill Plan EIR did not completely cover the land use, air quality, noise, and the delays to residential construction impacts of the PCS extension on the Rincon Hill Plan. The I-280 EIR does not provide any specific analysis of these effects in the Rincon Hill Plan Area. These impacts ought to be specifically addressed in the Final EIR.

Thank you for the opportunity to offer these comments.

Very truly yours,

Alec S. Bash
Environmental Review Officer

Enclosures

GB/ASB

cc: Wright
Shoaf
Rossi
Straus
Isaacson

RESPONSE TO COMMENT LETTER C-2

C-2.1: Section V.A.1 of the DEIR (pages V-3 through V-12) discusses the land use impacts. For Alternatives II-VI, the land parcels (or portions of) which would be either freed for potential development or preempted by the proposed transportation improvements were identified in the text by their location and size. In most cases the Assessor's Blocks (AB) or Seawall Lots (SWL) numbers of affected parcels were also identified in the text. Table V-1 on page V-5 shows the trade-offs and the net amount of developable land that could result under each alternative; but does not list each affected parcel. The table on the following page of this Addendum supplements the information provided in the DEIR by listing the affected parcels.

In the China Basin Area, significant changes in developable land would occur in Alternatives IV and IVA with the pullback of I-280 Freeway stub to Sixth Street. This would free a total of 21.3 acres of developable lands in AB 3795, 3804 and 3805 for Mission Bay development. The removal of the Embarcadero Freeway as proposed in Alternative III would free approximately 2.3 acres of developable lands in the Folsom/Howard Street corridor (AB 3738-3741), 0.9 acres under the Washington/Clay ramps (AB 202-203) and 1.2 acres under the Broadway ramps (AB 140, 141, 165 and SWL 324). The size of the developable lands in the Folsom/Howard Street corrdior would be reduced to 2.0 acres in Alternative IV by a new off-ramp, and all but diminished in Alternatives IVA, V and VA due to the addition of both on- and off-replacement ramps. The lands freed by the removal of the Washington/Clay ramps are in an area currently designated as open space and zoned "P", public district. Their development potentials would be affected by the adjacent uses.

Potentials for private developments on lands freed by the proposed transportation improvements will depend upon City's land use controls and policies on these land parcels. The parcels potentially freed by the removal of freeways will remain under Caltrans ownership until released through sale or transfer. Therefore, Caltrans' interests and policies will also influence the future uses of these lands.

C-2.2: Future transit and traffic demand forecasts for the Embarcadero corridor are based on City's current projections for downtown and city-wide growth. If removing the Embarcadero Freeway causes a significant increase in growth beyond the currently projected level or a significant shift in locational distribution of growth, future transit and traffic demands in the corridor will

DEVELOPABLE LAND* TRADE-OFFS BY ALTERNATIVES

	China Basin		South Beach/ Rincon Hill		Ferry Building Area	
Alternative II:						
Parcels (or portions of) Freed	None		SWL331-332	1.2	None	
Parcels (or portions of) Taken	AB3793-3796	2.7**	SWL332,334	1.2	SWL327	0.5
					SWL347S,348	1.9
Alternative III:						
Parcels (or portions of) Freed	AB3795	2.3	SWL331-332	1.2	AB3738-3741	2.3
					AB140,141,165, SWL324	1.2
					AB202-203	0.9
Parcels (or portions of) Taken	AB3793-3798	7.4	SWL332,334	1.2	SWL327	0.5
	AB3787	0.6			SWL347S,348	1.9
Alternative IV:						
Parcels (or portions of) Freed	AB3795	7.0	SWL331-332	1.2	AB3738-3741	2.0
	AB3804-3805	14.3			AB140,141,165, SWL324	1.2
					AB202-203	0.9
Parcels (or portions of) Taken	AB3795-3798	7.8	SWL332,334	1.8	SWL327	0.5
					SWL347S,348	1.9
Alternative IVA:						
Parcels (or portions of) Freed	AB3795	7.0	None		AB140,141,165, SWL 324	1.2
	AB3804-3805	14.3			AB202-203	0.9
Parcels (or portions of) Taken	AB3794-3798	10.3	SWL334	1.2	SWL327	0.5
					SWL347S,348	1.9
Alternative V:						
Parcels (or portions of) Freed	None		SWL331-332	1.2	AB140,141,165, SWL324	1.2
					AB202-203	0.9
Parcels (or portions of) Taken	AB3794-3797	9.6	SWL329-334	2.3	SWL327	0.5
			AB3768,3772	1.7	SWL347S,348	1.9
			AB3789	0.2		
Alternative VA:						
Parcels (or portions of) Freed	None		SWL331-332	1.2	AB140,141,165, SWL324	1.2
					AB202-203	0.9
Parcels (or portions of) Taken	AB3794-3797	9.6	SWL332,334	1.4	SWL327	0.5
					SWL347S,348	1.9
Alternative VI:						
Parcels (or portions of) Freed	None		SWL331-332	1.2	None	
Parcels (or portions of) Taken	AB3794-3797	9.6	SWL329-334	2.3	SWL327	0.5
			AB3768,3772	1.7	SWL347S,348	1.9
			AB3789	0.2		

* Parcels of less than 3,000 square feet (0.07 acre) or less than 15,000 square feet without access are considered undevelopable and therefore are not included in the table.

** Parcel size in acres.

exceed the projected level shown in the DEIR. The magnitude of possible increases in transit and traffic demand will vary with city policy and control over the type and size of future developments on parcels freed up by freeway removal. However, only Alternatives III and IV are likely to have a measurable impact on future travel demand due to a greater amount of developable lands potentially freed by the Embarcadero Freeway removal. As explained in Response to Comment C-2.1 above, the amount of developable lands potentially freed in other freeway removal alternatives (Alternatives IVA, V and VA) is likely to be limited to the stripe under the Broadway ramps, which would not have any significant impact on future travel demand.

C-2.3 The impacts referred to in the comment were discussed in Chapter V of the DEIR. Land use and urban design impacts appear at pages V-7, V-13-16, and V-20-21. Air quality impacts were discussed at pages V-94-96. Noise and vibration impacts were discussed at pages V-97-104, with specific discussions on page V-101. The impacts of the PCS extension were specifically addressed in the discussions for the South Beach/Rincon Hill segment which includes the Rincon Hill Plan area. For clarity, these impacts are summarized for the Rincon Hill Plan area in the following paragraph.

The impact of the PCS extension on the Rincon Hill Plan would depend on the relative timing of the two projects. If the PCS extension were constructed first, construction impacts would not affect subsequent residential development. Land use and noise impacts would be minimal if the PCS was underground as proposed in Alternative VA. If the track extension was at grade, land use and noise impacts would be more substantial as PCS tracks would bisect several of the parcels now proposed for housing development. The extent of these impacts can be minimized by careful design of track alignment and profile and mitigated by noise reduction measures incorporated into building design. Air quality impacts of both the underground and at-grade PCS options can be mitigated with new equipment and special ventilation design, although no significant adverse impacts were projected. If residential development occurred first, PCS construction impacts would be increased for Rincon Hill developments and the PCS extension. Land use, air quality, and noise would be the same as described above.

As stated in the DEIR at page V-116, specific housing plans for South Beach/Rincon Hill have yet to be developed. Therefore, it would be presumptious to identify specific construction-related impacts. However, attempt was made to provide generalized impacts at page V-116.

PORT OF SAN FRANCISCO

Memorandum

To : William Chastain, Caltrans

Date : Nov. 28, 1984

File No.:

From : Randy Rossi
Planning & Research

Subject: I-280 TCP Draft EIR

On September 4, 1984, I submitted a long list of comments on the pre-publication Draft EIR. These were submitted to the CTAC coordinator who forwarded them, with other City comments, to Caltrans and the DEIR consultant (E.I.P.). The consultant called me and we worked through some, but not all, of the comments. Note that some changes were made prior to the DEIR publication. Other comments made in September have been satisfied or withdrawn without the need for detailed responses.

Therefore, I have only two comments to make on the Draft EIR at this time:

1 1) p. A-52: The "Belt Line" designation is shown as a discontinuous system (for example, no tracks are shown connecting the rails south of the Ferry Building with those north of it). In fact the system is continuous and more extensive than shown.

2 2) pp. I-13; V-26, V-28: Although we acknowledge that the Transfer Concept Program is a "system study" and not a detailed implementation document, the Port Commission will ultimately be called upon to make certain findings of "surplus" and/or changes to lease and property lines. In order to do this, more information will be required about the rights-of-way, easements or takings, and property adjustments. If this information cannot be supplied at this time, a reference should be made to the future requirement for it.

cc: Doug Wright, PUC
Anna Wong, MUNI
Eugene Gartland, PORT

RESPONSE TO COMMENT LETTER C-3

C-3.1: Comment noted. The Belt Line is in fact a continuous system along the waterfront. The graphics on page VI-3 and page A-52 of the DEIR are revised to show a continuous Belt Line segment between Howard Street and Broadway.

C-3.2: As acknowledged by the commentator, the DEIR is a system level study of transportation improvement concepts for the I-280/Embarcadero corridor and not a detailed implementation document for specific projects. The Port Commission's needs for more detailed information about the rights-of-way, easements or takings, and property adjustments on land parcels under the Port's jurisdiction, is acknowledged. Such information will be available for Port review when detailed designs for selected projects are developed to implement the various elements of the Concept Program. For clarity, the following paragraph is inserted on page I-13, following the first paragraph; and on page V-2, following the third paragraph:

> Consistent with the purposes of the I-280 TCP study, impacts and mitigations are discussed in Chapter V at the system level. The discussion addresses the overall impacts of each alternative system improvement concept on the study corridor, in contrast to the discrete effects of individual system components or projects. Individual projects selected for implementation are subject to detailed design development; and the proposed project designs will require further environmental review and clearance. Project-level details will be available through design development for determination of project-level impacts and mitigations.

WILBUR W. HAMILTON, Executive Director

DIANNE FEINSTEIN, Mayor

Melvin D. Lee, President
Leroy King, Vice President
H. Jesse Arnelle
Charlotte Berk
Anne Halsted
Haig G. Mardikian
Walter S. Newman

SAN FRANCISCO REDEVELOPMENT AGENCY
939 ELLIS STREET • SAN FRANCISCO 94109
ADDRESS MAIL TO POST OFFICE BOX 646 • SAN FRANCISCO, CALIFORNIA 94101
(415) 771-8800

REFER TO:

November 29, 1984 110-16684-112

Mr. William Chastain
CALTRANS
P.O. Box 7310
San Francisco, CA 94120

SUBJECT: I-280 Transfer Concept Program
Draft Environmental Impact Report

Dear Mr. Chastain:

We are hereby transmitting to you the Redevelopment Agency's comments on the I-280 Transfer Concept Program (I-280TCP) Draft Environmental Impact Report (EIR). The comments relate only to those areas of the I-280TCP study area that encompasses portions of or all of the Rincon Point-South Beach Redevelopment Project Area and its periphery (e.g., Ferry Building Area).

Where there are comments on certain sections of the I-280TCP Draft EIR, the section, sub-section, and page number are cited for quick and easy reference.

-Section III., B., 2., c. Embarcadero Surface Roadway, Page III-10 (paragraph 3)

. . . "Brannan Street between First Street and the Embarcadero Roadway would be realigned to intersect the Embarcadero Roadway at 90 degrees. The realignment of Brannan Street would split an existing triangular parcel owned by the Redevelopment Agency." . . . .

1 This area is within the South Beach sub-area of the Rincon Point-South Beach Redevelopment Project area. The proposed realignment of Brannan Street to intersect the Embarcadero Roadway at 90 degrees which would bisect an existing triangular parcel (Seawall Lots 331 and 332) is contrary to what the original Redevelopment Plan parcelization envisioned. The Redevelopment Plan calls for the development of residential uses with neighborhood commercial on this parcel. This alternative would have a significant impact on the utility of the parcel as a housing resource. Furthermore, this existing parcel (Seawall Lots 331 and 332) is not owned by

the Redevelopment Agency; however, by virtue of a Master Lease Agreement between the Redevelopment Agency and the Port of San Francisco, the Agency has a long term lease on the parcel.

-Section III., B., 8., f. Street and Ramp Modifications, Page III-73

. . . "Making Third and Fourth Streets one way south of Market Street where they are already not so;" . . . .

2 This statement should be clarified to indicate the specific beginning point in the South of Market area being proposed to be made one way. It gives a different impression than what is really intended.

-Section IV., A., 1., b. South of Market Area; Trends and Planned Land Uses, Page IV-18 (paragraph 1)

. . . . "The hotel may include 400 to 800 units at a site along the Embarcadero Roadway;" . . . .

3 This should read "400 to 800 rooms" instead of units.

-Section IV., A., 1., c. The Ferry Building and Areas North of Market Street; Existing Land Uses, Page IV-19 (paragraph 4)

. . . "With the completion of Golden Gateway Commons III in 1983, . . ."

4 The final phase of the Golden Gateway Commons III Housing Development is not due for completion until the end of 1984.

-Section IV., A., 2., c. Neighborhoods, Page IV-32

"The project area includes portions of eight neighborhoods- China Basin, South of Market, Downtown, Chinatown, Telegraph Hill, North Beach, and the Marina." . . . .

5 It states eight neighborhoods, but only seven (7) are listed.

-Section VI., C., 1., d. Proposed South Beach Park, Page VI-23

. . . "A 20-foot wide pedestrian promenade would be provided along the park's waterfront edge, featuring views to a proposed 700-berth small boat harbor and the bay." . . . "Under the proposed plan, the existing restaurant at the foot of Berry Street would remain, but all other structures on the site, and the Belt Line tracks, would be removed." . . . .

6 The 700-berth small boat harbor is no longer a proposed project. A construction contract has been awarded and construction will commence early December 1984.

7 The proposed South Beach Park does not call for the removal of all structures on the site. The Project calls for the retention of an existing office building, ILWU building at 4 Berry Street.

-Section VI., A., 2. Impact on Historic Resources, Page VI-3/VI-8

"Potential Rincon Point/South Beach Historic Warehouse-Industrial District (11)."

8 The Redevelopment Agency does not believe that there is adequate justification for the creation of a Historic Warehouse-Industrial District west of First Street. We fail to see how this assortment of buildings meets the eligibility criteria for inclusion on th National Register of Historic Places. Therefore, we are strongly recommending that this proposed Historic Warehouse-Industrial District not continue to be considered as an element in the Draft EIR or the I-280 Transfer Concept Program. It should also be noted that portions of three blocks within this proposed District, plus the Lydia, the Rincon Annex, the Oriental Warehouse, and the Seaman's Institute are all located in the Rincon Point-South Beach Redevelopment Project Area for which the procedures of Section 106 of the Historic Preservation of 1966 (16USC470) have been completed.

9 Should you require further explanation of the preceding comments, or need additional information or assistance, please call me. We are also requesting to be included in the distribution list for the Final EIR. Please keep us advised of the progress of the I-280 TCP study. Thank you.

Sincerely,

Thomas G. Conrad, Chief
Planning, Housing, and Programming

cc: Anna Wong, Municipal Railway

RESPONSE TO COMMENT LETTER C-4

C-4.1: On page III-10, second full paragraph, line 11, the words "owned by" are replaced by "under long-term lease to." The following sentence is inserted before the last sentence of this paragraph: "This area is within the South Beach sub area of the Rincon Point-South Beach Redevelopment project area, in which the triangular parcel referred to is planned for residential uses combined with neighborhood commercial."

C-4.2: In Alternative VI, the proposed modifications to Third and Fourth Streets in the South of Market area are identical to those under Alternatives II, III, IV or V, as stated in the DEIR (page III-73). Third Street is proposed to be made one-way northbound from Fourth Street to Berry Street. Fourth Street is proposed to be made one-way southbound from Brannan Street to Third Street.

C-4.3 On page IV-18, first paragraph, sixth line, the word "units" is changed to "rooms."

C-4.4 On page IV-19, fourth paragraph, third line, "1983" is changed to "1984."

C-4.5 On page IV-32, second paragraph, second line, "Nob Hill," is inserted between "Downtown" and "Chinatown."

C-4.6 On page VI-23, second paragraph, line seven, the word "proposed" is deleted. On page VI-23, second paragraph, line ten, after the phrase "on the site" insert "except for the ILWU building at 4 Berry Street,".

C-4.7 Please see Response to Comment C-4.6.

C-4.8 For the I-280 Transfer Concept Program, a preliminary historical resources assessment was prepared by David Chavez, consulting archaeologist, and by Page, Anderson and Turnbull (Working Paper 2.2.5). A Historic Properties Survey report was prepared by Caltrans. Existing historic and architectural inventories were consulted in preparation of the Historic Properties Survey Report, including the National Register of Historic Places, National Historic

Landmarks, the California Inventory of Historic Resources, California Historical Landmarks and the City and County of San Francisco Landmarks.

Twenty-nine resources within the Area of Potential Environmental Impact (APEI) of the proposed alternatives are identified in the Historic Properties Survey Report that are either listed on the National Register, determined eligible for, or judged potentially eligible for this listing. Figure VI-1 on page VI-3 of the DEIR and page IX-8 of this report, lists these resources and indicates their locations and National Register status. A description of each can be found in Appendix F of the DEIR and page IX-8 of this report. Final determinations on the potentially eligible resources will be made after consultation with the State Historic Preservation Officer (SHPO) and the keeper of the National Register. The Federal Highway Administration (FHWA) and Urban Mass Transportation Administration (UMTA), along with the SHPO, were involved in establishing the APEI. It was agreed that all buildings to be affected or removed for the project, as well as one row of buildings beyond, were to be evaluated.

The Criteria for Evaluation (Art. 36 code of Federal Regulation 800.3), which were applied to each resource in determining its National Register eligibility, state that:

The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

A. that are associated with events that have made a significant contribution to the broad patterns of our history; or

B. that are associated with the lives of persons significant in our past; or

C. that embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. that have yielded, or may be likely to yield, information important in prehistory or history.

The Potential Rincon Point/South Beach Historic Warehouse-Industrial District contains 60 buildings which Caltrans has designated as contributing to the significance of the area. As stated in the DEIR, the potential Rincon Point/South Beach Historic Warehouse-Industrial District is significant in the areas of history and architecture and appears to meet National Register Criteria A, B, C and D. Portions of the potential Historic District, plus the Lydia, the Rincon Annex, the Oriental Warehouse and the Seaman's Institute are all located in the Rincon Point/South Beach Redevelopment Project Area.

It is noted that the San Francisco Redevelopment Agency does not agree with the findings of the Historic Properties Survey Report with respect to the Potential Rincon Point/South Beach Historic Warehouse-Industrial District. It is the Redevelopment Agency's opinion that:

> The Redevelopment Agency does not believe that there is adequate justification for the creation of a Historic Warehouse-Industrial District and especially not one which overlaps into the South Beach sub-area of the Rincon Point - South Beach (RP-SB) Approved Redevelopment Project (area west of First Street, south of Bryant Street, up to the boundary of the Rincon Point - South Beach Redevelopment Project).
>
> Within the South Beach sub-area of the RP-SB Redevelopment Project, there are four structures which are either eligible or potentially eligible for inclusion in the National Register of Historic Places and the remains of the "Lydia", a 19th century sailing ship located beneath the Embarcadero at King Street. The structures are: Cape Horn Warehouse; Oriental Warehouse; Hooper's South End Grain Warehouse; and the 52 Colin P. Kelly Street Warehouse (the latter two are also known collectively as the Japan Street Warehouses). All of these structures have undergone extensive historical assessment in compliance with the National

Historic Preservation Act of 1966. Furthermore, the Land Use Plan in the Official RP-SB Redevelopment Plan provides for the retention and historic restoration for adaptive re-use of these structures. Additionally, the Redevelopment Agency, in fulfillment of its obligations from the RP-SB Final EIR/S has commissioned an archaeological monitoring during construction activities. This additional historic/archaeologic work will result in a Summary Information Handbook to be used by future developers in the Project Area.

The Redevelopment Agency believes that it has complied with the National Historic Preservation Act of 1966 as it relates to the historic resources within the RP-SB Redevelopment Project and that areas and/or structures within this Project Area need not be included in the designation of a Historic Warehouse-Industrial District. The Redevelopment Agency also believes that "Rincon Point - South Beach" should, for obvious reasons, not be used as the name to designate a potential Historic Warehouse-Industrial District in this area of the waterfront."

Caltrans, the author of the Historic Properties Survey Report, acknowledges that the 106 process was formally completed by the Redevelopment Agency for the Rincon Point - South Beach Redevelopment Project, insofar as the four structures discussed above are concerned. However, Caltrans notes that: (1) the 106 procedures for any Caltrans elements are not complete with respect to the potentially eligible Warehouse-Industrial Historic District identified in the Historic Properties Survey Report, (2) SHPO, FHWA and UMTA concur with Caltrans' Staff findings that the identified historic district is potentially eligible for the National Register of Historic Places, and (3) Sec. 4(f) of the National Transportation Act as well as Sec. 106 of the Historic Preservation Act will require a formal Determination of Eligibility for the district as an entity, with SHPO and Advisory Council consultation, if the District is affected by a federally-funded transportation project.

C-4.9: The Redevelopment Agency is added to the distribution list for the Final EIR, as requested.

City and County of San Francisco

Department of Public Works
Bureau of Engineering

C-

November 30, 1984

I280 TCP-DEIR
File #39

Mr. William Chastain
Caltrans
P.O. Box 7310
San Francisco, CA 94120

Dear Mr. Chastain:

We have two comments regarding the transportation analysis that we feel should be addressed in the final EIR:

1. In Appendix E of the DEIR, Tables E-1, E-4 and E-6 compare year 2000 peak travel times and delays along city streets relative to existing conditions. The basis for determining these travel times and delays appears to assume that intersections are kept open and do not "lock-up". As queues on city streets increase under the various alternatives by year 2000, as shown in Figures V-2 to V-9 and Table V-9, it may take more and more police enforcement to keep the intersections open for cross traffic. If such enforcement is not forthcoming travel times and delays to transit and other vehicles could increase significantly over that projected. It would appear important that this be pointed out in the report. 1

2. There is no discussion of how midday traffic conditions in the downtown will be affected by the different alternatives. The midday period can often be a more difficult time to move about in the downtown than during the peak hours when significant towaway is in effect. Could midday congestion be increased substantially under some alternatives if more vehicular traffic must travel on surface streets between the north and south of Market Street? How would the alternatives impact midday transit and truck movement in the downtown over existing conditions? The potential midday impacts should also be discussed in the report. 2

Thank you for the opportunity to comment on the report.

Very truly yours,

N E Bray

N. E. Bray
Sr. Traffic Engineer

(415) 558-3608 Room 351, City Hall San Francisco 94102

RESPONSE TO COMMENT LETTER C-5

C-5.1: The comment is correct that in the travel time and delay analysis, it was assumed that cross street traffic is not blocked at intersections. This is because even under queueing, traffic would still be moving but at slow speed and in a restricted environment. The travel time and delay calculations reflect the effects of queueing on travel speed and signal delay at intersections. It was recognized, however, due to uncertain behavior of traffic under extensive queueing for long durations, intersection blockage could occur in the absence of traffic enforcement. The combination of projected auto, bus and pedestrian movements in the Embarcadero Freeway removal alternatives would create traffic conditions on major freeway access routes that have a tendancey to break down in peak periods and would be best served by police enforcement.The need for police traffic enforcement was evaluated in Working Paper 2.2.2, Chapter VII, page VII-25. The following excerpt is from that report.

> It should be noted that queueing is dynamic, moving typically at an average rate of 4 to 5 miles per hour (MPH) including signal delay. Some segments where queueing is extensive for long durations, vehicle speeds average approximately 2 MPH. Vehicles have very little or no freedom to maneuver where queueing is indicated. In the absence of manual (police) traffic control, intersection blockages could occur, impeding east-west circulation. Even though local circulation would be difficult, manual traffic control of major freeway access corridors could be used to allow local traffic to continue. Traffic lanes which do not directly access the freeway could be kept clear by enforcement and diverted away from on-ramp approaches. For example, the left-most lane on First Street should be directed to eastbound Harrison Street only for local circulation and not used for Bay Bridge queueing.

The essense of this evaluation was brought out in the DEIR on page V-74, third paragraph. In order to further clarify this point, the next to last sentence of that paragraph is revised as following: "In order to maintain clear intersections manual traffic control would be required at 10-20 intersections, depending on the alternatives, along major freeway access corridors."; and the following sentence is added to the end of that paragraph: "Should cross street traffic be blocked travel times and delays to transit and other vehicles could increase significantly over that projeted."

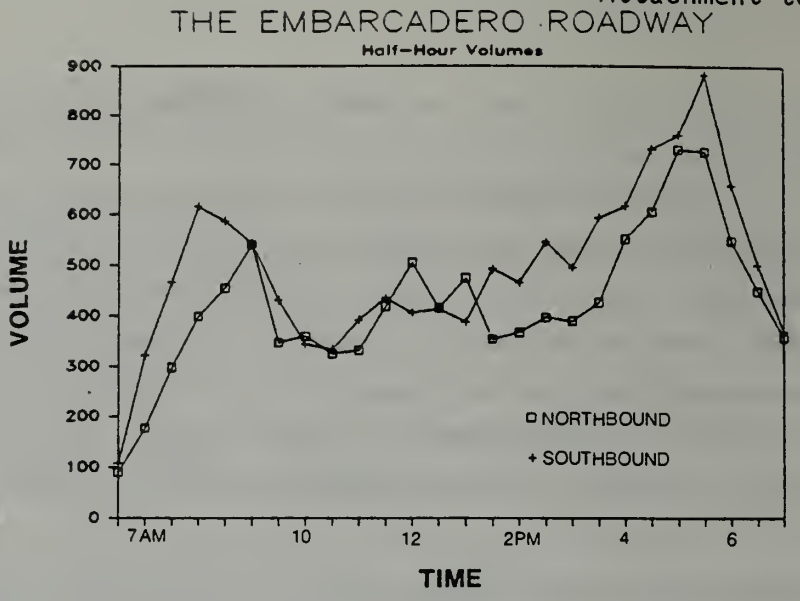
C-5.2: Midday traffic impacts were discussed in Working Paper 2.2.2, primarily related to goods movement along the Embarcadero*. In addition, the surface street analysis covers a period of six hours which represents some intrusion of peak traffic activity into the midday period. Figures V-2 to V-9 in the DEIR graphically show the surface street conditions for the three hour PM peak period. The time periods over which traffic conditions were analyzed for this study were established in conjuction with the Technical Advisory Committee with input from the Department of Public Works. The time periods and process are documented in Chapters III and IV or Working Paper 1.5.6.

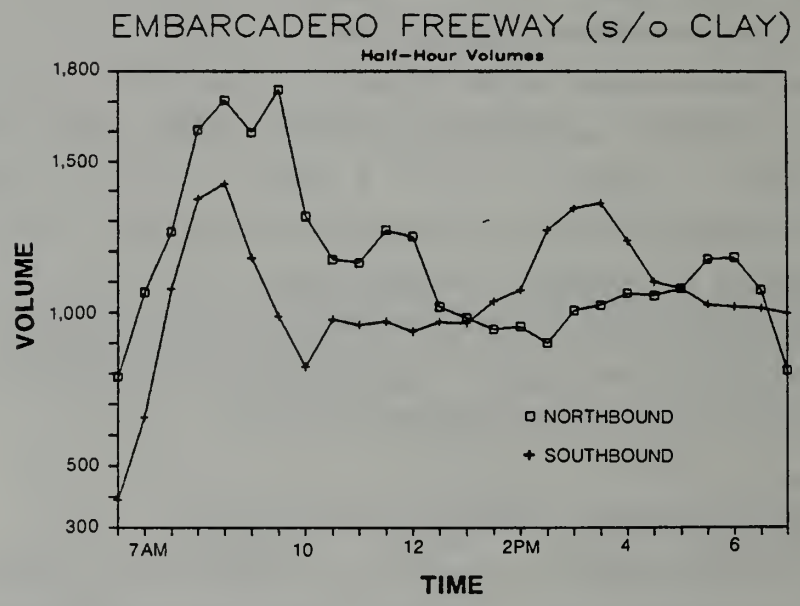
The analysis presented in Working Paper 2.2.2 discusses traffic, transit and goods movement impacts in more detail for each alternative. In terms of the alternatives, evaluation of midday conditions would not provide a further index of impacts since the alternatives which are detrimental to traffic in the peak periods would also be detrimental during midday. The traffic conditions summarized in Figures V-2 to V-9 would generally be representative of potential problem areas in the midday but without the significant magnitude and duration of queueing since less traffic would be on the surface street system. To get a feel for the difference in traffic volumes between midday and peak periods, existing volume data were summarized in Figure 1 showing half hour volumes for the following locations*:

- The Embarcadero roadway at Market Street;
- The Embarcadero Freeway south of the Clay Street on-ramp; and
- A cordon line south of Market Street between Steuart Street and Fifth Street.

Figure 1 is attached for reference.

* - Refer to Page III-11 of the July 1983 report and Page IV-11 for Alternative V-A in the August 1983 supplement.





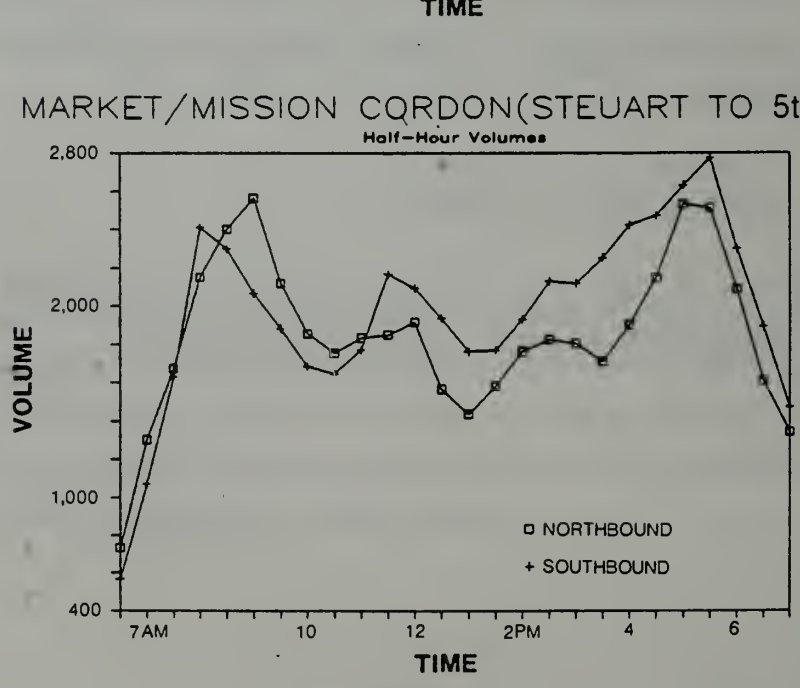


Figure 1
TRAFFIC VOLUMES - 1983

VI COMMENTS AND RESPONSES - GROUPS (G)

Page, Anderson & Turnbull, Inc.

17 October 1984

Mr. William Chastain
Caltrans
P.O. Box 7310
San Francisco, CA 94120

Re: Draft EIR
I-280 Transfer Concept Program

Dear Mr. Chastain:

I am directing this letter to you at the suggestion of Mara Melandry, regarding an omission in the referenced document.

1

Our firm performed work on the I-280 Transfer Concept Program as a subcontractor to ROMA Architects, San Francisco. Our office was responsible for identifying and assessing potential impacts of alternative actions on significant historic and architectural resources located within the project area.

Key personnel of our office for this project consisted of the undersigned, serving as Project Manager; Jack W. Schafer, Architectural Conservator; and Woodruff Minor, Architectural Historian.

We believe that inclusion of our firm's name, together with a brief description of the work which we performed and a listing of key personnel, would constitute an appropriate addition to the Final EIR document.

Thank you for your attention to this matter.

Very truly yours,

Robert Bruce Anderson

RBA:ms

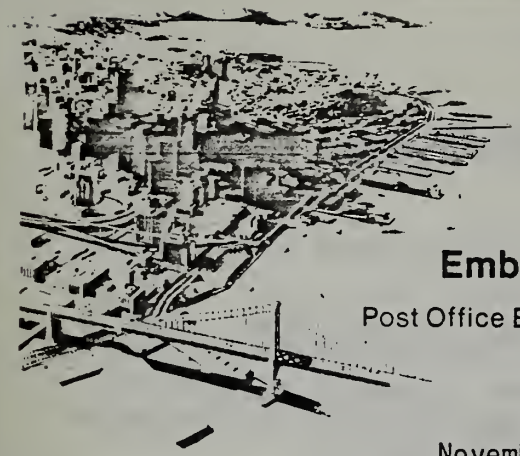
364 Bush Street • San Francisco, California 94104 • 415 362-5154

RESPONSE TO COMMENT LETTER G-1

G-1.1: The following information is added to page XI-3, to be inserted between "ROMA" and "Aileen C. Hernandez Associates":

"Page, Anderson & Turnbull, Inc., San Francisco, California. Subconsultants to ROMA, responsible for identifying and assessing potential impacts of alternative actions on significant historic and architectural resources located within the project area. Key personnel and their titles include:

Robert Bruce Anderson:	Project Manager
Jack W. Schafer:	Architectural Conservator
Woodruff Minor:	Architectural Historian



RECEIVED
NOV 26 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Embarcadero Citizens Committee

Post Office Box 2115, San Francisco, CA 94126 (415) 261-5932

November 8, 1984

Co-Chair:
Anne W. Halsted
Jon Twichell

Sterling Albert
Richard Allen
Suzan Ballsun
Bruce Bauer
William C. Blake
James R. Bronkema
Virgil P. Caselli
John C. Diamante
Charles A. Dunn
Rod Freebairn-Smith
Ruth Gravanis
Edward A. Green
Mark Hackman
Anne W. Halsted
Jeffrey Heller
Bonnie B. Jones
Nancy Katz
Bob Katz
John Kirkwood
Lee Knight
Barry Kroll
Ken Lerch
Karl Limbach
W. Gene Mays
Michael McGill
Christopher McKay
Robert Meyers
Jane Morrison
Tito Patri
Dennis Potts
Michael Reardon
Norman Rolfe
Belinda Ryland
Paul T. Solon
Robert K. Spiker
Charles Starbuck
Stephen L. Taber
Deborah Tash
Nat Taylor
Jon Twichell
Karen Wallsten
Jane Winslow

Department of City Planning
450 McAllister Street
San Francisco, CA 94102

Re: I-280 Tranfer Concept Program EIR

Dear President Rosenblatt and Members of the Commission,

Our organization is a unique group of over forty business leaders, neighborhood activists, professionals, and environmentalists. For five years we have actively advocated the implementation of the Northeastern Waterfront Plan, including the removal of the Embarcadero Freeway. We are unified around the goal of removing the stub-end of the Freeway and thus bringing the city closer to its waterfront. 1

However, we wish to stress that the Freeway removal is not our sole objective. It is only one of many changes needed to improve transportation in the northeastern quadrant of the city. The changes include: 2

- removal of I-280 from Third Street to Sixth Street, with two new ramps connecting the remaining freeway with the Embarcadero roadway via Berry and King Street
- removal of the Embarcadero Freeway from Beale Street to Broadway with new ramps at Spear and Howard Streets
- improvement of the Embarcadero roadway providing for four lanes, and in some places six lanes, of automobile traffic with a pedestrian walkway to the Ferry Building
- Muni E-Line rail service from Fort Mason to the SP Depot
- extension of the Muni Metro from the Embarcadero Station to the SP Depot at Fourth and Townsend
- additional street and ramp modifications, intercept parking beneath the Bay Bridge, and low-cost transportation system management (TSM) improvements to make existing transportation systems in the Embarcadero Corridor more efficient

3 We urge you to certify the I-280 EIR before you. We feel it has properly addressed the transportation problems and has accurately described their impacts. We further believe that the EIR proves Alternative IV-A to be the best choice in that it provides for a maximum amount of transportation improvements, as well as for maximum urban design benefits.

4 The committee will make specific comments at the November 15th hearing, and our environmental counsel, Marc Mihaly, will submit written comments as well.

Thank you for your attention to this matter. In the midst of everything else going on, it must be a real pleasure for you as a Planning Commissoner to see the Northeastern Waterfront Plan one step closer to implementation.

Sincerely,

Anne W. Halsted
Co-Chair
Embarcadero Citizens Committee

Jon Twichell
Co-Chair
Embarcadero Citizens Committee

RESPONSE TO COMMENT LETTER G-2

G-2.1: The Embarcadero Citizens Committee's expressed goal of removing the stub-end of the Embarcadero Freeway and thus bringing the city closer to its waterfront, is noted.

G-2.2: The Committee's expressed preference for the cited transportation improvements is noted. All of these improvements are elements of Alternative IV-A.

G-2.3: The Committee acknowledges that the DEIR has properly addressed the transportation problems and has accurately described their impacts. The Committee's choice of Alternative IV-A is noted.

G-2.4: Additional comments from Committee representatives and responses to these comments are cited elsewhere in this Addendum. See Comment Letter G-12, Commentator P-1, P-2, and their responses.

THE TELEGRAPH HILL DWELLERS

11/10/84

Mr. Russell D. Sayre
Project Manager
P.O.Box 7310
San Francisco,CA 94120-7310

RE: I-280 TRAMSFER CONCEPT - DEIR

Dear Mr. Sayre,

I won't be able to attend the November 15 hearing concerning the I-280 Transfer Concept DEIR.

1 Since I have been a member of every Citizens Advisory Committee on the San Francisco waterfront since 1968, I would like to go on record as strongly supporting the removal of the elevated Embarcadero Freeway between Broadway and Beale Street and replacing it with a four-lane landscaped roadway (with turn-off lane where appropriate). I would also want to support the E-Line (*). This solution would carry out the spirit and the letter of the BCDC and the San Francisco NE Waterfront Plans which were worked out based on a well-balanced and solid citizens' consensus. The time has come to implement these plans(**)

2 I would like to take the opportunity to express our gratitude for the tremendous amount of work you and your staff have devoted to this important project.

Sincerely,

Robert Katz
Chair,THD Waterfront Committe
2 Whiting Street
San Francisco,CA 94133

(*) Withoud FCS extension at this time.
(**) BCDC Special Area Plam # 1, pp.3+18; San Francisco Waterfront Plan, pp 53 f)

RESPONSE TO COMMENT LETTER G-3

G-3.1: The Telegraph Hill Dwellers' strong support for the removal of the elevated Embarcadero Freeway between Broadway and Beale Street and replacing it with a four-lane landscaped roadway (with turn-off lane where appropriate), is noted. Also noted is the group's support for the Muni E-Line, without PCS extension at this time.

G-3.2: Comment noted.

TENANTS & OWNERS DEVELOPMENT CORPORATION
• COMMON SENSE FOR THE COMMON MAN •
TODCO
PHONE: (415) 896-1880
230 FOURTH STREET
SAN FRANCISCO, CA 94103

CALTRANS
PO BX 7310
San Francisco, Ca. 94120 November 12, 1984

RE: Comments on DEIR
I-280 Transfer Program (CCSF: 84.385.ENLA)

The relationship between the Project Alternatives and the future residential community to be developed in the South Beach Redevelopment Area is one of the very most important issues to be investigated in the project environmental review process.

The DEIR does make many references to this issue, but they are scattered rather than focused, incomplete, and fail to address critical specific matters.

Revisions to the DEIR are in order along the following lines:

1. The two Embarcadero-fronting parcels slated for residential development within the South Beach Redevelopment Area are commonly identified as Parcels J and K by the Redevelopment Agency. These will be impacted in major ways, along with two privately-owned parcels, by several of the I-280 Project Alternatives. Extensive detail on these impacts is of great importance, including:

a. large scale diagrams of this area showing routings of streets and transit under the various Alternatives, as well as speicifying any change to parcel size/shape. 1

b. clear description of construction period impacts on these parcels, if developed residentially as provided in the existing Redevelopment Plan, for each of the various Alternatives.

c. clear descriptions of post-construction permanent impacts on these parcels, particularly regarding noise and access, for each of the various Alternatives.

d. with regard to the Alternatives proposing on-grade or below-grade heavy rail routing in this area, thorough description of the impacts on residential development of

TENANTS & OWNERS DEVELOPMENT CORPORATION
• COMMON SENSE FOR THE COMMON MAN •
PHONE: (415) 896-1880
230 FOURTH STREET
SAN FRANCISCO, CA 94103

Parcels J and K - will it become infeasible? If below-grade, what about ventilation facilities, fumes, etc.?

2. A clear statement of which Alternatives conflict with the adopted Redevelopment Plan for this area, as well as the underlying City Master Plan policies. 2

3. Identification of possible mitigations measures of real significance. For example, if J and/or K are made infeasible for residential development, can the nearby Cal Trans properties be 'swapped' as replacements? 3

TODCO is a non-profit community housing development corporation which is interested in potential joint-venture development of mixed-income housing on Parcel K as provided in the present Redevelopment Plan. Resolution to these matters is vital for avoidance of long delays and financial risk with regard to such an effort.

Sincerely,

John Elberling
Director of Projects

RESPONSE TO COMMENT LETTER G-4

G-4.1: The I-280 TCP DEIR is a Program EIR which addresses issues and impacts of alternative transportation improvement concepts for the study corridor. Projects selected to implement the preferred concept will be subject to detailed design development and implementation planning. Issues related to project-level impacts on individual land parcels will be more adequately addressed based on proposed design for selected projects.

Narrative description and sketch plans have been provided in the DEIR to illustrate the roadway and transit improvement concepts affecting the South Beach Redevelopment Area. More detailed plans and section drawings can be found in Working Papers 2.2.1a and 2.2.1b, which are supporting documents of the DEIR. However, the development of project-level details which specify changes to the size and shape of individual land parcels is not within the scope of the DEIR. Such information is subject to detailed design of selected projects and will be available through the project design development process.

Construction impacts and post-construction impacts of the alternatives on the proposed residential developments in the South Beach Redevelopment Area were addressed in Chapter V of the DEIR. In addition, the impacts of an at-grade or underground PCS extension to downtown were specifically addressed in Sec. VII.A: Summary of Major Unavoidable Adverse Impacts and Mitigation Measures. However, these impacts were addressed with respect to the study corridor, or to the South Beach Redevelopment Area, rather than to individual parcels. Detailed impacts and mitigations to individual parcels will vary with the proposed design for selected projects and will be addressed during project design development.

G-4.2: As stated on page VII-14 of the DEIR, Alternative IV-A provides the necessary street closures and intersection redesign in the South Beach/Rincon Hill Area to be consistent with the City and County of San Francisco's Northeastern Waterfront Plan (NEWP) that provides the greatest specificity to City Master Plan policies for the general area. As stated on page VII-14 of the DEIR, the NEWP is consistent with the Rincon Point - South Beach Redevelopment Plan,

the most specific expression of Redevelopment Agency policies for the area. In addition, the other alternatives incorporate extensive street closures and redesign in the South Beach/Rincon Hill area that would be consistent with the NEWP's general objective of minimizing through traffic in that area to a few arterial routes. Once specific projects are considered for implementation, site-specific impacts can be identified and mitigation measures adopted.

G-4.3: Replacement lands is a mitigation measure to right-of-way taking. The feasibility and the extent of land exchange would vary with the specific design of projects selected for implementation. It will be a subject of investigation during development of selected projects.

MEETING COMMENTS

State of California - Please Print - Department of Transportation

Name Omar Keating Date 11-15-84

Address 18316 Hale Ave Morgan Hill CA 95037

Representing Self, and Peoples for Efficient Transportation (P.E.T.)
(Business, Organization, Association, etc.)

I wish to speak . . . . . [please check) Yes.

I would like to have the following question(s) answered:

1 Is it possible to still obtain approval of the I-280 extension to US 101 (I-80.) what would it take to add that alternative to the EIR?

I would like to make the following statement for the record:

2 1) I want to see I-280 extended to US 101 (I-80 Bay Bridge) with minimal environmental impact. That alternative should be re-added to this EIR. It is not a satisfactory EIR until a true Transit-Freeway comparison is considered.

Furthermore, I-280 should be studied to I-80 (US 101) with an exclusive Busway/carpool guideway. Alternatives II or VI are minimally acceptable, except that we oppose the EIR unless it includes I-280 to I-80 (US 101) as freeway.

Form 4 AD 221 (Rev. 7/73)

ADD me
to mailing
List.

3

also

ADD

People for Efficient Transportation
2110 Mangin Way
San Jose CA 95148

RESPONSE TO COMMENT CARD G-5

G-5.1: As stated in the DEIR, the originally planned 1.4-mile connection of I-280 with the Embarcadero Freeway (SR 480) waterfront route and the Bay Bridge (I-80) was withdrawn from the Interstate Highway system in December, 1980, upon a joint request from the Mayor of San Francisco and the Governor of California, with the concurrence of the Metropolitan Transportation Commission (MTC). At the same time a Concept Program of substitute projects for the withdrawn segment of I-280 was submitted to the U.S. Department of Transportation for possible federal funding under the provisions of a 1973 amendment to the Federal Highway Act, Title 23. The withdrawal of the I-280 segment is an accomplished political fact based on public opinions and following established procedures. The Transfer Concept Program is a result of this accomplished fact. As such, the planned linkage is no longer a valid alternative to be addressed in the DEIR for the Concept Program.

G-5.2: The commentator's desire and opinion are noted. However, as explanied in G-5.1 above, the originally planned linkage between I-280 and I-80 is no longer a valid alternative to be addressed in the DEIR.

G-5.3: The commentator and the group he represents are added to the mailing list, as requested.

RUSSIAN HILL IMPROVEMENT ASSOCIATION
1015 Francisco Street
San Francisco California
94109
Nov. 16, 1984

State of California
Dept. of Transportation
PO Box 7310
SF, Cal 94120

re: I-280 Transfer Concept
(One-way couplet, Bay and
North Point Streets)

We refer to the TSM Improvements included as part of Alternatives IV, IVA, V, VA and VI: " a one-way couplet at Bay and North Point Streets between Van Ness and Columbus Avenues ".

1 Although both Bay and North Point Streets are now admittedly heavily travelled, they are basically residential, and Bay St. includes a block-long park alongside, between Hyde and Larkin Streets. The additional traffic-assault on our neighborhood by making these two streets one-way thoroughfares would be totally unacceptable.

We therefor request that this one-way couplet suggestion be removed from the Draft EIR.

Sincerely,

Frank Hinman

Frank Hinman, M.D.
President.

RESPONSE TO COMMENT LETTER G-6

G-6.1: It is noted that the Russian Hill Improvement Association objects to the proposed one-way couplet at Bay and North Point Streets between Van Ness and Columbus Avenues. The proposal is part of a total traffic system designed to improve access and circulation by existing traffic in the northern waterfront area rather than to attract additional traffic from other streets. The one-way operation is expected to reduce traffic frictions, facilitate turning movements and thus improving the quality of traffic flows on Bay and North Point Streets. It also helps to mitigate the impacts of other transit and road improvement proposals for the area on local residents. The merits of this proposal, as well as the Association's objections, deserve to be considered by the decision makers in the selection of preferred projects for implementation.

Telephones: (415) 673-5858
673-4625

G-7



Standard Fisheries Corporation

November 20, 1984

Mr. William Chastain
I-280 Transfer Concept Program
Caltrans
P.O. Box 7310
San Francisco, California 94120

Re: Draft EIR Comments on I-280 TCP

Dear Mr. Chastain:

First of all, as part owner and a corporate officer of Standard Fisheries, we feel that some serious questions must be asked regarding I-280 which affect the future economic growth of our company, and naturally are very concerned. Our company is directly affected by I-280 as we are located in Fish Alley, mentioned a number of times in the report, adjacent to Jefferson Street, and are a leasee of the Port well past the year 2000. We feel that the comment and concern made here are also the concerns and questions of other fish companies in a like position in this area.

As a brief summary of our traffic operation, we feel that you should know the following:

1. All fish companies in San Francisco, while also being producers of fish and unloading product from boats in San Francisco, are also heavily into distribution of fish products throughout San Francisco and the Bay Area. We are very dependent upon all types of trucks, from low tonnage to the largest long-haul rigs allowed on Federal highways. The future portends even greater use of trucks than ever before due to the importance of air freight for shipping and receiving in San Francisco. Both Oakland and San Francisco International Airports are used regularly, as well as I-280, Hwy. 101, Broadway and Washington Ramps, as well as other ramps, and the Bay Bridge to Hwy. 17 and Hwy. 80.

2. Our customer base is expanding, presently in the East Bay/Concord/Walnut Creek area, as well as some current growth in San Francisco. We are expecting large new growth in the South of Market based on new projects by the City, i.e. Yerba Buena, Mission Bay, Rincon Hill. One of the largest customer bases today of San Francisco is in North Beach, Chinatown, Downtown, outer Richmond and Sunset, upper Mission and Market St., and Fisherman's Wharf, with very little in the South of Market as yet.

3. Presently we are forced to use Jefferson Street from Jones to Aquatic Park for stacking of semi's during the week, occuring from 4:00 a.m. until 2:00 p.m. While this is usually not for extended periods of time, it usually takes about ½ to 1 hour to unload or load a dual tractor vehicle. Most of our vehicles are running between the hours of 4:00 a.m. and 2:00 p.m., with most traffic before noon. There is no planning available to

P.O. BOX 2232 • FOOT OF LEAVENWORTH STREET, SAN FRANCISCO, CA 94126

date by the Port of San Francisco to address this problem, mostly due to lack of funding for the Fisherman's Wharf Action Plan which includes a new fish facility with truck loading facilities.

4. Because of the already difficult times of delivery to small accounts in San Francisco, i.e. small family owned restaurants and retail fish stores, the trend in the past has been an increase of our customers picking up their own fish, due to the long delivery times for the downtown area. This trend is expected to increase as streets become more congested. Our present delivery times have extended to the point that it does not pay to deliver to small accounts, i.e. cost of gas, and labor outweigh any profit from small deliveries. As a result, we foresee more on-street parking needed in the immediate area to service these early morning customers. There is no mention of this in the EIR, and in fact a major reduction.

It is with the above in mind that we would like the following concerns and questions raised about the draft EIR on I-280:

1 1. Throughout the report, we find almost no statistical information on counts of truck traffic on the Embarcadero Extension during the hours of our operation, i.e. 4:00 a.m. to 2:00 p.m. As two thirds of our delivery vehicles, originating out of the East Coast and Southern California, use this freeway, what impact do the alternatives have on their accessing our plants and the Northern Waterfront?

2 2. While I attended the public scoping sessions on I-280, it has come to my attention that a special scoping session was held for small business. I cannot remember having been invited to any meeting concerned with the problems specifically of light industry. What can be done to address their concerns, as well as my own company's? I believe I only heard of the business session the night of November 15th public hearing.

3 3. Much of the report deals with results occuring during the evening hour commute. What happens to the morning commute, as our delivery trucks are trying to access the Northern Waterfront? I can't find any statistics! Nor for non-commute hours?

4 4. Many of our trucks avoid the Downtown Area by accessing the Embarcadero Freeway and bypassing the area for the East Bay or South Peninsula. With the removal of the Freeway, what routes will be available to us, other than involving ourselves with the downtown area, adding to street congestion? What mitigation has been made? Has there or is there a study to check the feasibility of allowing our trucks to use transit exclusive lanes to facilitate the movement of goods within and without the city?

5 5. The study seems to try to mitigate loss of on-street parking somewhat for automobile traffic. What mitigation is taken for loss of on-street parking for our delivery vehicles? Both on Jefferson Street due to the "E" line and in the Downtown area?

6 6. On page IV-98, Table IV-19, "Energy Consumption of Vehicles in San Francisco", there is no mention of delivery vehicles or trucks. Our fuel consumption is mostly all diesel, so we can't be considered in Motor Vehicles. What is the effect on the environment of longer travel times for

our trucks due to increased fuel consumption, and what are the increased economic costs for use of more diesel? I can't find any study or answers to these questions.

7

7. Presently, City Planning on all new buildings is requesting off-street loading docks for commercial delivery. These are not always adequate for delivery of more than four trucks at a time. What effort is being made to expand this approach in new projects in the Study Area? How do we address delivery of small businesses, not involved in larger buildings, which do not have off-street unloading facilities? What affect does morning traffic in the Downtown area have on accessing for delivery? The report shows major intersections blocked during the evening commute, but doesn't show projections for the morning commute. Is it also extended in the number of hours, and, if so, what intersections will be blocked again, preventing simultaneous delivery of goods?

8

8. It appears that with the removal of the Freeway, one alternative access from the South Peninsula would be the Van Ness Corridor. What is the estimated traffic use in the year 2000 for Van Ness, and what effect on travel times would this have on delivery vehicles? What local concerns from Van Ness residents would have to be addressed as to noise, diesel fumes, etc.? This still does not solve problems of access from the East Bay; what alternative accesses do you think we would use?

9

9. In general, what will be the impact on our business by each of the access differences between the various alternatives? We can't find anything in the report on this.

10

10 What effect of increasing traffic due to new projects, Rincon Hill, etc. have on the delivery time of trucks? The YBC project is not even mentioned as to impacts. Presently, our delivery trucks use Mission, Howard, Bryant, Townsend, and other streets off the Embarcadero to access other parts of South San Francisco quickly. Under many of the proposals, many of the accesses off the Embarcadero have been totally eliminated or redirected. What effect will this have on accessing San Francisco from the Embarcadero? Also, many of the remaining intersections are made to be perpendicular and more restrictive than at present; what effect will this have on turning radius' of large semi's? On all turn lanes on Embarcadero, what effect will this have on ease of turns by large double-rigged trucks?

11

11. 10 Foot left turn pockets are on the Embarcadero roadway design. How long are the pockets, and how feasible are they for large truck turns? Can it be considered that all truck traffic also use transit exclusive lanes? While we are not carrying people, we are carrying goods for large amounts of people which must be serviced rapidly and efficiently. Can this be considered as a mitigation, and is it being considered?

12

12. It is evident that the entire length from Fisherman's Wharf to China Basin can accept wider lanes. It is very possible to have two track lanes for fixed rail, and still have 6 lanes for vehicles. If the freeway comes down, can one of these lanes be for truck vehicles only? Why wasn't more study made into maximum use along the Embarcadero, rather than constricting it to four lanes? Especially when there is room available.

13. What mitigation is being made to avoid traffic conflicts between a fixed rail and commercial traffic in the Fisherman's Wharf area across Jefferson St., i.e. Leavenworth, Jones, Taylor, Powell, etc.?

14. How do you explain access to our business via Jefferson by making it two-way? What mitigation exists on Jefferson between Jones and Hyde for the present stacking, loading and unloading of vehicles, in the event that the Port does not implement the Wharf Action Plan due to lack of funds? Where are our trucks going to go? To Oakland, like our ships?

15. Will the City, State, and Federal pay for necessary relocation of all of our businesses based on possible restrictions and increased time of commercial delivery? This seems to be intimated as far as small business in the South of Market, why not the North of Market? Can this money be used to help the Port develop its Action Plan for relocation of fish plants and the development of modern facilities?

16. No mention is made in the report on increased economic costs to San Franciscans due to increased costs of goods delivery. This cost is not weighted into costs of the alternatives, and should be to more adequately make a correct decision. Costs are increased labor times of delivery, increased fuel costs, increased pollution costs, increased vehicle maintenance due to stop and go traffic, and faster replacement costs of vehicles. I am assuming increased costs, as the report only talks of increased times of reaching a destination.

17. The report seems to assume a shift away from San Francisco of light industrial and shipping (see p. II-5). Is this valid and is it wise? What effect does I-280 have on accelerating this shift or discouraging it? Doesn't a city have to survive based on all areas of human needs, rather than just office jobs? How are the residents in the projected growth areas going to get their food? Are their costs going to be higher than other areas of the Bay Area? What effect does this have on low and medium income households? Based on longer delivery distances and times for basic supplies, what effect does this have on economic sales of medium income housing as proposed in some of the projects? Our housing costs are already one of the highest in the nation. Is the City prepared to offer tax incentives to keep wholesale delivery operations in San Francisco as a mitigation measure? What are the costs of such measures to maintain low prices of food for the lower income levels?

18. Under Progam Goals, p. II-14, the only mention of delivery of goods is "to provide facilities for the safe and efficient movement of goods and commodities", "conserve energy" and "provide access to port facilities and water transportation for both people and goods". Nowhere do we find a priority of delivery of goods to the rest of the city and how we are going to do this under the proposed alternatives. We need more information on this and suggested mitigation proposals. Throughout the EIR delivery of goods is given little notice, even though established in the Program Goals. There is no mention of access to the rest of the city from the Port area.

19. Page III-2 - Reconstruct six-lane surface roadway throughout was dropped. We now see a proposal for four lanes to the Northern Waterfront.

Why was this mitigation proposal dropped, and what effects does this have on the movement of goods in the morning to the rest of San Francisco?

20. Page III-6 - The Fisherman's Wharf Action Plan was not considered as part of the Concept Program, yet it directly affects and dovetails into traffic mitigation proposed. What effect does this have on the alternatives if the Action Plan is implemented or not?

20

21. Page III-11, Alternative II: Sections, shows lanes on the Embarcadero as 13 feet each lane. Is this standard, above standard or below standard for large vehicle access? What effect do 90° turns have on large vehicle traffic versus what we have now to access the Northern Waterfront? On Page III-24, Alternative III: Sections, lanes on Beach are now reduced to 12 feet each lane. Same question. Also, how do our trucks access Fish Alley and where do they stack for unloading? What effect on 90° turns under this scenario and conflicts with fixed rail? You have totally cut us off from our customer access picking up by automobile, as well as truck delivery, with no suggested mitigation for Fish Alley as can be seen in Alternative IV, p. III-30. Under Alternative IVA, p. IIIO-38, the situation worsens dramatically by restriction totally of traffic on Jefferson between Taylor and Jones, Hyde St. is totally cut off for any future development on the Hyde St. Pier, and Jefferson cut from Leavenworth to Hyde. How does this effect the Fisherman's Wharf Action Plan for increased commercial traffic on the new Hyde St. Pier, and the need for vehicle access to the increased berthing for fishermen within the new breakwater? What mitigation is being made for parking for fishermen who need cars to come early in the morning when public transit is not working? How do they get supplies into their boats? On a fixed rail?

21

22. Throughout the EIR, there seems to be a "Transit-First" policy, which we certainly support, as our trucks wish to remove competition with passenger auto vehicles. Yet, until we can use public transit for delivery of goods, I think we are being lumped into passenger vehicle status. As a result, the report does not address at all how a "public-transit" policy affects the delivery of goods. Because of this, truck delivery is not given any weighting in the report adequate to the reality. Can this be corrected now, and what effect does this have on the alternatives?

22

23. What effect will increased commercial truck traffic have on the Embarcadero Roadway on pedestrian access to the Northern Waterfront? Presently, we are separated by the overhead roadway. Won't the elimination of the overhead roadway cause more negative effects on heavy pedestrian access to the Ferry Building unless a number of traffic lights are installed? If this is done, what effect will this have again on lengthening delivery times needlessly? Is this a really good environmental and public access solution? Are we going to build underground pedestrian access to the waterfront all along the Embarcadero to address this problem, and why isn't this being considered as part of the alternatives? What is the cost and why isn't it shown. The Port is creating a number of public accesses on the water all along from the Ferry Building to the Wharf, how are pedestrians and San Franciscans going to access this area with increased traffic flows? This is not addressed at all in the report. Presently our trucks come down Broadway exit, using Battery and Sansome. Under many of

23

the alternatives, they will now be coming down the entire length of the Embarcadero, thus impacting more pedestrian access to the water.

24. Under Alternative III, IV, and V, existing parking along Jefferson and Beach is eliminated (p. III-65). What mitigation parking is being allowed for to handle our customers picking up fish, the increased amount of fishermen trying to access their boats, etc.? Especially when the report shows that 90% of off-street parking is being utilized during the working week (p. IV-85). There is no consideration of on-street parking for our customers, who usually are in and out in a short time, early morning hours before the tourists arrive. What happens to them? It is impractical to deliver 100 lbs. of fish to a garage, four floors up, in an elevator. Can this be addressed?

24

25. We would certainly support "making Bay and North Point Streets a one-way couplet between Columbus and Van Ness" (p. III-73) as this would improve truck access from the Golden Gate and Marin area. This is one of the few places where truck access is addressed and improved.

25

26. One of the reasons for all these questions is that your Land Use Map C, p. IV-9 is wrong. All of "Fish Alley" is designated as either "RE" or #5, 6 or 7. What the numeric designation means is not made clear. This area properly should be "W". Pier 45 is designated as "MT", how do you perceive condominiums, hotels, and support retail as "maritime"? What effect does this oversight have on the study? On pg. IV-10, San Francisco Zoning Map, there are also major differences with the new Commercial Rezoning Study of San Francisco. This should be updated. What effect does this have on the study and commercial traffic impacts?

26

27. What effect will heavy truck use on the Embarcadero Roadway have on proposed residential areas under the South Beach and Rincon Point Development Area? By maintaining the freeway, this problem is somewhat mitigated by overhead access to Hwy. 101 and the Bay Bridge. Under alternatives where the freeway comes down, heavy trucks must access along the Embarcadero surface. Is there mitigation necessary for this regarding noise levels? Will the developers of residential be made aware of this, and utilize heavy insulation materials to deaden outside traffic noise from commercial vehicles?

27

28. On p. IV-44, a statement is made on creating a scenic route on the Embarcadero to "stop and observe". It seems to mean that an attempt should be made to enhance the Embarcadero for views. How does this conflict with or enhance smooth, efficient and quick delivery of commercial goods and foodstuffs? On the next page, IV-45, the report seems to criticize "a set of narrowed streets ending in the congestion of commercial activity at Fisherman's Wharf". While we agree, by constricting the Embarcadero from 6 to 4 lanes, doesn't this also lead to the same negative effect at the Ferry Building, and lead to increased congestion on the entire northern waterfront? Especially with the alternatives calling for the Freeway removal? Can we have it both ways? Can pedestrians still jay-walk across the Embarcadero to the water under these conditions? Or will other ways of pedestrian access to Pier 35 be designed, i.e. overhead bridges like Pier 39? How does this affect visual impacts of the water? Are we suggesting

28

under highway walkways for pedestrians? What impact and problems result with this approach due to soil conditions in this area which is all fill? Has any of this been considered? In the South Beach Park, are overhead or under highway pedestrian walkways being considered to access these recreational areas? What kind of parking access is being allowed for delivery of supplies and equipment to boats moored in this development? Will this conflict with increased heavy truck usage on the Embarcadero Roadway to access Hwy. 101 via the Third St. Ramp.

29. Because most of our employees come to work at 4:00 a.m., including fishermen, what type of headways and starting times will be required on the "E" line? On p. IV-65, the Study states that the 32 line's ridership has declined since 1975. This is true due to inadequate service at the early morning hours, as our employees and fishermen cannot wait for 45 minutes to get to Fisherman's Wharf. Because of the emphasis away from auto use, will the "E" line run 10 minute headways, 24 hours a day to address mitigation of this problem and give a viable alternative to the needs of these people? Due to present service, they have no alternative but use of the private automobile. How will such mitigation tie in with BART service or East Bay transit service? Will they change service to access in the early morning hours?

29

30. On p. IV-70, the study states that AC Transit does not call for any increase in Transbay capacity due to financial restraints. In view of increased usage by autos on the Bay Bridge at top capacity, how are people going to access the Wharf through public transit, i.e. the "E" line or "F"? On p. IV-77, East Bay Corridor, it is already stated that the Bay Bridge is deficient by 1.3 lanes. It is really deficient by 1.5 lanes or 2,800 vehicles per hour in the Year 2,000. 1,200 it is stated will be accommodated by lengthening peak period use. Remaining trips divert to Bart and carpooling. How do you move truck goods under these projections? Why wasn't it considered in the study? Are you suggesting a transit exclusive lane on the Bay Bridge for commercial trucks? Again to promote use of public transit vs. private auto? Why is this not considered?

30

31. On p. IV-86, Goods Movement is addressed. It states a doubling of traffic in the near future. What is the near future? 2000? or 1990? It also states most is related to maritime. You devote one paragraph, with no reference to supply vehicles to our businesses. With the advent of computers, paper alone will have to be moved into the area in larger volumes. It states maintenance of access, yet access is eliminated on many of the streets under various of the alternatives. How is this justified? Secondly, it is evident that the delivery of goods other than maritime have not been considered at all. How is this addressed? It seems to ignore our need to exit the area and to deliver the rest of San Francisco during the hours of 5:00 a.m. to 2:00 p.m. More emphasis is made on rail traffic. The report states 75 cars a year; this equals 6 cars a month or about 1+ per week, yet there is no weighted analysis of delivery truck frequency to our area, which I know is substantially above rail frequency. Why so much on rail, and not enough data on truck delivery?

31

32. On p. IV-102-105, Noise levels, the Report shows South Beach/Rincon Hill to be exposed to Ldn of 65 to 70 dBA, yet the intersection of Golden Gateway Commons on the Broadway and Washington offramps are already at 71

32

dBA. With this information, estimated dBA for other areas studied seem to be too low under alternatives which remove the Freeway, and above the City's goal of an Ldn of 60 dBA. In other words, alternatives which remove the freeway seem to be exposing other areas needlessly to levels above city standards. Has a proposal for highway noise barriers, as used in Japan, been considered for the Embarcadero Roadway to alleviate this problem? Especially in the South Beach/Rincon Hill areas where residential fronts on the Roadway? What about headlight effects during early morning travel by trucks within residential areas? Again, road barriers would reduce the lights and their effect on residential.

In closing, I have deep concern that no emphasis was made on the impacts on commercial delivery vehicles and their needs for efficient delivery, nor on the delivery requirements of business throughout San Francisco. This applies to my business, as well as others trying to deliver goods in San Francisco. Our other concern is the approach to our business location, with no mitigation or mention of the loss of parking on our customers who pick up, and park on Jefferson and Leavenworth, or the trucks which unload in this area. Also, there is no mitigation for early hour commute by any of our employees as transit starts at 6:00 a.m. to midnight with 15 minute headways on the "E" line; so public transit is impossible, yet parking and auto traffic for their commute is discouraged. Lastly, there is insufficient data on early morning commute and traffic patterns to make it impossible to determine the effects on delivery within and without San Francisco, and what impact the alternatives have on the flow of goods during the morning hours.

I sincerely thank you for the time in addressing these concerns, and apologize for the perhaps incoherent format present in the questioning. This is in part due to the voluminous format of the EIR itself and its far-reaching scope which seems to overlap in many areas. Your task is not easy, but these concerns, I think, are critical not just to our company but to all other small businesses in San Francisco, and especially those involved in the delivery of goods. Based on the answers we get, and the mitigation suggestions made to address the above negative impacts, we will then suggest an alternative to the other companies which can be supported. There is no doubt that something must be done, but how the City does it is of extreme importance to the future costs and standard of living its inhabitants can afford.

Sincerely Yours,

Patrick J. Flanagan
Secretary/Treasurer

cc: Alioto Lazio Fish Company
Fisherman's Wharf Seafood
California Shellfish Company
M. Alioto Fish Company
United Shellfish Company
FWMA
San Francisco Board of Supervisors
Mayor Dianne Feinstein

RESPONSE TO COMMENT LETTER G-7

G-7.1: Because of the scale and complexity of this study, it was not possible to analyze different traffic patterns during different hours of the day. The transportation impacts were analyzed for the p.m. peak period as the impacts on street traffic within San Francisco are more severe during this period than in other periods to most of the system users. The city has a large number of daily commuters from other parts of the region. The capacity available in each of the regional corridors leading into San Francisco serves to regulate the inbound flows during the morning commute hours but limit the outflow from the City during the evening commute period. Also, there is greater background (non-commute) traffic on city streets in the evening peak period than in the morning peak period. As a result, the level of congestion on city streets is more severe in the evening commute period than in the morning commute period. Please see Response to Comment C-5.2 for more discussion on midday traffic impacts.

The impacts on truck access to the waterfront area were discussed in Sec. V.C.4 under Goods Movement. As stated in the DEIR, the removal of the Embarcadero Freeway would reduce access to the I-80 Freeway for Alternatives III and IV, but the new on-and off-ramps proposed in Alternatives IV-A, V and V-A would help to mitigate the impact. Also, a new I-280 on-ramp in the China Basin area would improve freeway access for Alternatives II, III, V, V-A and VI.

G-7.2: Chapter IX of the DEIR describes in detail the many ways information was disseminated to the general public and how participation was elicited from the general public during the EIR preparation period. In addition to the November 15, 1984 public hearing, a public comment period was incorporated into the Draft EIR review process and lasted from October 15, 1984 to November 30, 1984.

A public meeting was held on June 1, 1982 to determine issues to be addressed, alternatives to be examined and the methodology to be used in the preparation of the EIR. This meeting marked the beginning of the scoping process. Public

workshops were held in July and August of 1982 to review and revise work prepared up to that time. In addition, meetings were held with over 20 groups in the San Francisco area, including a workshop for businesses held on February 8, 1983. The Fisherman's Wharf Merchants Association was invited to and represented at the business session.

G-7.3: For reasons described in Response to Comment G-7.1, the impact on delivery trucks would be less severe during early morning hours or other non-commute hours than during the evening commute period.

G-7.4: Mitigations to the impacts of Embarcadero Freeway removal include the new on-and off-ramps in Alternatives IV-A, V and V-A, a new I-280 on-ramp in Alternatives II, III, V, V-A and VI, a reconstructed Embarcadero surface roadway in Alternatives II through VI, and the various transit improvements included in the alternatives. Allowing truck use of exclusive transit lanes could improve goods movement, but would increase the potential for truck/transit conflict and reduce the effectiveness of the intended improvement in transit performance. The feasibility of this proposal will vary with location and the planned level of transit service, and should be determined on a case-by-case basis during detailed planning and design of projects selected for implementation.

G-7.5: Mitigation to impact on delivery vehicle parking on Jefferson Street include mixed use of transit lane in Alternative II, one-way E-Line on Beach and Jefferson Streets in Alternatives III, IV, V, V-A and VI, and truck loading bays on Jefferson Street in Alternative IV-A. No loss of delivery vehicle parking in other downtown areas was projected under any alternative. It should be noted that additional mitigation measures to loss of on-street parking in the Fisherman's Wharf area are possible and should be investigated further. The required mitigation measures are integral parts of project design and must be developed with direct participation in the design process by individuals, groups or businesses affected by the project.

G-7.6: Based on a conservative estimate (i.e., the true value is likely to be lower) of the average percentage of diesel trucks in San Francisco of 5%* and a daily

total VMT in San Francisco of 5.9 million, a rough estimate of 0.295 million miles of diesel truck travel per day is obtained. At an average fuel economy of five miles per gallon, this results in a fuel usage of about 0.06 million gallons of diesel fuel per day. These figures are based on engineering estimates because detailed data on diesel truck travel throughout San Francisco are unavailable. The estimate of motor vehicle fuel use in Table IV-19 does not explicitly consider diesel trucks and should therefore be reduced by 5% to about 105,000,000 gallons.

Because each of the alternatives is predicted to result in a negligible overall change in the amount of truck travel in the project vicinity, diesel fuel used by trucks does not appear in Tables V-14 through V-16. However, as discussed in the transportation analysis, certain affected streets, such as The Embarcadero in the Fisherman's Wharf area, may cause some delivery trucks to use longer access routes. In such cases, there would be an increase in fuel consumption and air pollutant emissions. Since diesel trucks emit carbon monoxide at rates similar to passenger cars, no major CO impact would occur. In contrast, diesels emit greater quantities of hydrocarbons, a principle component of smog, than passenger cars and would therefore have greater impact per vehicle on regional smog formation. However, the overall quantities involved would not produce a measurable change in regional air quality.

The magnitude of the predicted change in truck travel is well within the margin of error of the analysis and these effects were therefore not individually detailed. Nonetheless, the comment is correct in pointing out that some merchants would be negatively affected by the proposed project due to changes in the routes their vehicles must take.

*This is based on cordon counts conducted by JHK & Associates for the San Francisco Department of Public Works, March - June 1983.

G-7.7: Being a Program EIR, the document addresses impacts and mitigations at the "system" level. It is not a detailed design or implementation plan for a "project". Project-level mitigations or specific measures required to meet the specific needs of affected groups are integral parts of a project design. One

such measure could be designation of on-street spaces where needed for existing structures. These will be addressed when specific projects are selected for further development, with direct participation in the project development process by affected groups. Please also see Response to Comment G-7.1 and G-7.3 for impacts during morning commute period.

G-7.8: Additional use of the Van Ness Corridor by delivery trucks from the Peninsula was not projected. With the proposed improvements in I-280 touch-down, new on-and off-ramp connections to the remaining portions of the Embarcadero Freeway, and the reconstruction of the Embarcadero surface roadway, the waterfront route would still be more attractive than the Van Ness Corridor for trucks from the Peninsula area. As projected in Table E-6 (page A-48) of the DEIR, the year 2000 p.m. peak period travel time from the Fisherman's Wharf area to San Mateo would differ only by one to two minutes among the alternatives with and without the Embarcadero Freeway. The alternative use of the Van Ness corridor could add substantially more travel time. Please also see Response to Comment G-7.1 for impact on access from the East Bay.

G-7.9: Removal of the Embarcadero Freeway would reduce access from the Northeast Waterfront to the I-80 Freeway for Alternatives III and IV. Alternatives IVA, V and VA include removal of the Embardacero Freeway, but new on- and off-ramps directly connect to the Embarcadero roadway, thereby simplifying access to the waterfront compared to the existing ramps which are oriented toward the Financial District.

Conflicts between trucks and autos would increase for Alternatives III-VA due to higher traffic volumes along the Embarcadero roadway caused by removal of the freeway. Alternatives I, II and VI, which do not involve removal of the Embarcadero Freeway, would have no impact on trucks and auto conflicts. Transit/truck conflicts would increase north of the Ferry Building for Alternatives III-VI where the E-Line operates in the median, requiring trucks to cross streetcar tracks. Compared to Alternatives II, III, IV, V and VI, Alternatives IVA and VA improve truck access along the Embarcadero roadway.

Alternatives II-VI all remove truck loading zones in the Fisherman's Wharf area to accommodate exclusive transit lanes. Alternative II would have less impact since truck loading could occur in morning hours with E-Line bus service operating in mixed flow.

Pedestrian conflicts with trucks in the Port area would be reduced for all alternatives except Alternative I since the Promenade, new sidewalks and signalized crosswalks along the Embarcadero roadway would organize pedestrian flows and reduce exposure to trucks. Along inland portions of the project corridor, trucks would experience similar delays as other vehicular traffic.

G-7.10: The traffic analysis was based on City's growth projections for the study area. It included the effect of existing new projects as well as future developments up to the projected growth level. The effects of the projected growth on street traffic were discussed in Sec. V.C.2, under Traffic and Parking. The projected increases in block-hours of queuing and in travel times were shown respectively in Figures V-2 through V-9 and in Table E-6 (page A-48)

Access from the Embarcadero to Mission, Howard, Bryant, and other streets south of Market Street have not been eliminated or redirected in most of the alternatives. The only exceptions are: Mission Street between Spear Street and the Embarcadero was closed to through traffic in Alternative V-A, and Townsend between Colin P. Kelly and First was closed in Alternatives II through VI. Mission Street is a transit preferential street. The Embarcadero-Townsend access is lightly utilized and can be better served by the improved Embarcadero surface roadway in the King Street alignment.

Intersection realignments were proposed to improve access, turning and traffic safety for all users, rather than to restrict access by trucks. Similarly, turn lanes on Embarcadero were provided to facilitate access and circulation by all traffic. The sketches and discussions included in the DEIR describe the concept of improvement, but not a detailed design. Specific turning requirements of large delivery vehicles will be addressed in the detailed design of selected projects.

G-7.11: Please see Response to Comment G-7.10 and G-7.4 which encompass the same comment.

G-7.12: The I-280 Transfer Concept Program has many goals and objectives. Maximizing transportation uses is only one of them. Proposals which maximize transportation uses are not always consistent with land use, urban design, environmental, traffic safety, and other objectives. The alternatives were developed to illustrate the possible trade-offs among the many goals and objectives. A six-lane surface roadway throughout was considered in the study under the objective of maximizing transportation uses. However, it became evident during the initial screening and from public input that a four to six-lane concept would be a more flexible approach to achieving this objective while considering the other objectives of the study.

G-7.13: As reflected in the concept design of the alternatives, mitigations to truck/transit conflicts across Jefferson Street would include additional traffic signals at street intersections, signal coordinations, proper location for transit stops, speed control for both trucks and transit vehicles, access control of through traffic in the Fisherman's Wharf area, and traffic engineering measures in intersection design, signing and pavement marking. Other mitigation measures are possible and will be addressed during design development of selected projects affecting the Fisherman's Wharf area.

G-7.14: The DEIR does not suggest mitigation measures for vehicles loading on Jefferson between Jones and Hyde. Details of this nature would be addressed in additional studies leading to specific traffic circulation plans and development impact plans which will be part of the project-level environmental clearance for selected projects.

G-7.15: Payment of relocation costs is one means of mitigating the impact of transportation improvement. The DEIR identifies system-level impacts and mitigation measures. The I-280 TCP has not yet evolved to the point where specific projects have been selected and developed in detail. Specific projects would have to be designed to enable assessment of specific impacts and, in turn, development of specific mitigation measures. Consideration of a

specific mitigation measure like payment of relocation costs would have to be considered premature at this juncture in the I-280 TCP process.

G-7.16: The comment is correct that the alternatives would result in higher costs for goods movement in parts of the corridor due to reduced access or greater volumes of traffic. The specific costs will vary depending on the specific routes and frequency of deliveries used by each carrier and cannot be estimated from the level of analysis appropriate to the DEIR. These costs must also be weighted against certain other economic benefits also not quantified in the DEIR, such as increased long-term patronage of businesses in the corridor due to an overall improvement in the transportation system.

G-7.17: The I-280 study documents economic trends that are occurring in San Francisco and does not try to evaluate the long-range effects or desirability of these trends. Certain economic and land use assumptions were made in order to analyze transportation impacts. These assumptions are consistent with City planning policies. Questions of economic and social policy are not the subject of this DEIR and were not addressed.

G-7.18: The I-280 study was designed to look at the teardown of the Embarcadero Freeway and other alternatives involving transportation in and out of the waterfront area north and south of the Bay Bridge. Access to the waterfront and downtown is in many ways synonomous with access to San Francisco. A detailed study of intra-city movement of goods was beyond the scope of the DEIR. However, the impacts on intra-city goods movement due to increased level of street congestion were analyzed in Sec. V.C.2 as part of surface street performance impacts.

G-7.19: Please see Response to Comment G-7.12.

G-7.20: The I-280 Transfer Concept Program is a program of transportation improvements concepts for the I-280 study area. The I-280 TCP is not intended to preclude other, more specific plans, but rather be supplementary and complementary to those plans. An example of this complementarity appears on pages III-6 of the DEIR where, in addition to the Transportation

System Management (TSM) projects identified as a part of the I-280 TCP, there could be other TSM improvements resulting from independent ongoing studies in the project area (e.g., the Ferry Building renovation project and the Fisherman's Wharf area access study).

G-7.21: The dimensions shown on the plan and section drawings for the alternatives illustrate the concepts of improvement, but not a detailed design of each alternative. Although they do reflect current design standards, they are subject to changes and refinements during project design based on more detailed information on local street conditions and the specific mitigation measures required to meet the needs of local residents and businesses.

Access to businesses in the Fisherman's Wharf area have been maintained in all alternatives for local traffic. The access control shown on the alternative plans is intended to redirect through traffic in the area in order to reduce the impact of auto/transit/pedestrian conflict. The plans shown in the DEIR are not detailed access and circulation plans for the Fisherman's Wharf area. Such detailed plans will be developed for selected improvements concepts to address the specific access and parking needs of local businesses.

G-7.22: The I-280 Transfer Concept Program alternatives all have a wide range of impacts on numerous individuals, groups and businesses. Because of the scale and complexity of this study, it was not possible to identify the impacts by each individual, group, or business, in a single document. Judgments have been made as to the level of detail and form of presentation of the information suitable for inclusion in the DEIR, and technical working papers have been prepared to supplement the information presented in the DEIR. In making the judgments, CEQA and NEPA guidelines have been followed and care has been taken not to overlook or de-emphasize the impacts on any affected group.

The impacts on delivery services were discussed in the DEIR under Goods Movements (Sec. V.C.4, pages V-79 and V-80). These impacts were addressed in terms of truck access to freeways, access to waterfront piers, constraints in truck movement along the waterfront, loss of truck loading zones in the Fisherman's Wharf area, and potential conflicts between truck and auto,

transit and pedestrian. Also, it was recognized that changes in the waterfront area would also have direct and indirect impacts on delivery services in downtown, the financial district, or other parts of the city. Such impacts would include changes in delivery routes, reduced curbside services, and increased delivery times due to congestion spillover from the waterfront area. These impacts were addressed in the DEIR under Traffic and Parking (Sec. V.C.2 pages V-53 through V-77), and quantified by the estimated numbers of block-hours of queuing, travel times between representative origins and destinations, and number of parking spaces removed and supplied. Additional discussion on delivery services impacts can be found in Working Paper 2.2.2: Transportation Performance Measures.

G-7.23: The impacts on pedestrian access to the waterfront under each alternative were adequately addressed in the DEIR. (See Sec. V.C.3, Pedestrian Circulation, pages V-77 through V-79.) Under the Embarcadero Freeway removal alternatives, the increased traffic volume on the surface roadway would have negative effects on pedestrian access to the waterfront area and would cause additional delays in all traffic, including delivery trucks. Mitigation measures have been proposed as part of the alternatives, including additional traffic signals and signal progression along the entire length of the reconstructed Embarcadero surface roadway and grade-separated pedestrian crossings in the Ferry Building area.

G-7.24: Mitigations to loss of parking on Jefferson and Beach Streets could include providing replacement parking off-streets, allowing short-term curbside pickup and delivery in early morning hours, or selection of the do-nothing alternative. It is emphasized that the DEIR addresses the impacts of alternatives as a basis for informed decision on the preferred course of action. The impact of a selected course of action must be further mitigated with project level measures during the project design process.

G-7.25: Standard Fisheries Corporation's support for the one-way couplet on Bay and North Point Streets between Columbus and Van Ness Avenues, is noted. It is also noted that the Russian Hill Improvement Association has expressed its objection to this proposal (see Comment Letter G-6).

G-7.26: The areas labeled 5, 6 and 7 on Land Use Map C, page IV-8 and page IV-9, were incorrectly labeled. They are revised to "W" to indicate warehouse and wholesale trade uses. Pier 45 is correctly labeled "MT" (maritime). It still functions as a working pier and warehouse area. Any incorrect designations on the land use map would have negligible effects on traffic impacts because the parcels in question are extremely small in comparison to the analysed area of San Francisco. The Neighborhood Commercial Rezoning Study was a "proposal" at the time of the I-280 study. However, the differences would have negligible effects on the system-level impacts addressed in the DEIR.

G-7.27: Truck use on the Embarcadero roadway in the South Beach/Rincon Hill area is presently heavy. The DEIR identifies diesel trucks on this roadway to be the major noise source in the area today. Under the alternatives where the Embarcadero Freeway would be removed, it is anticipated that there would be an increased volume of both automobiles and trucks on this road. However, the resulting increase would not significantly raise noise levels in this area. It is calculated that noise levels would increase by less than 2 dBA along this road under any of the alternatives. A 2 dBA increase in wayside noise level is not judged to be significant and would be barely noticeable. Because noise levels are high in this area, any plans for future development must make provision for this noise environment. Before approving development in this area, the City of San Francisco would require an environmental study showing how the project would be designed to be compatible with the future noise environment. The DEIR provides information about the future noise environment under the various alternatives considered. It should be noted that energy requirements for new construction require double glazing and the installation of insulation which would reduce noise.

G-7.28: Please see Response to Comment G-7.12 and G-7.23. Specific design issues related to the underground pedestrian walkway across the Embarcadero surface roadway have not been addressed in the DEIR, as they are more appropriate for consideration in the design of selected projects. A grade-separated pedestrian walkway was not proposed for the South Beach Park area. Access to the South Beach Park development is maintained off the Embarcadero raodway. Potential of conflicts due to increased heavy truck

usage on the Embarcadero surface roadway exist under all alternatives. This impact can be mitigated with the proposed signalization and other traffic engineering improvements for the reconstruction of the surface roadway.

G-7.29: The hours of service and frequencies for E-Line were suggested to illustrate the operating concept of this transit element and to provide a common basis for analysis of the alternatives. They were not intended as elements of an "operations plan". If E-Line is selected for implementation, a detailed operations plan will be developed during the project design phase, considering the specific needs of all affected groups. Such an operations plan could include early morning hour service and closer headways to serve employees and fishermen in the Fisherman's Wharf area. The possibility of required changes in the regional transit services (BART, AC Transit, and others) to meet the Fisherman's Wharf transit needs cannot be determined at this time. It should, however, be explored during the development of coordinated regional/local transit operations plan for the E-Line.

G-7.30: Please see Response to Comment G-7.29 for coordination of regional/local transit services. The proposed transit lane at the San Francisco end of the Bay Bridge is intended for inbound buses to bypass potential traffic backups during the morning commute period. It has the potential of encouraging more transit usage and thus reducing congestion in other vehicle traffic, including trucks. An exclusive lane for commercial trucks would be less effective, considering all users.

G-7.31: As stated on page IV-86, the doubling of Bay Bridge bound truck traffic in the waterfront area was based on studies by the Port. The projection was tied into the type and extent of activities reflected in the Port's policies and plans rather than to a specific year. It was clearly stated on page IV-87 that "most goods movement in the project area is related to maritime and commercial activities", not just to maritime activities. Although no specific reference was made to Standard Fisheries Corporation, the goods movement activities of the fishery industry in the Fisherman's Wharf area were clearly mentioned on page IV-87. Access for goods movement in the Fisherman's Wharf area have not been eliminated (please see also Response to Comment G-7.21). The

discussions provided in the DEIR address the impact on goods movement, rail and truck.

G-7.32: The noise level information on pages IV-102 through 105 represents existing conditions in the area. The measured L_{dn} of 71 dBA outside the Golden Gate Commons condominiums represents the noise environment outside of the nearest residential development to the Embarcadero Freeway. The noise level of 65-70 L_{dn} indicated in the South Beach/Rincon Hill area is the level that exists at a distance from the Embarcadero roadway where proposed residential development is expected to occur. These units are considerably farther from the Embarcadero roadway than the Golden Gateway Commons are from the Embarcadero Freeway. Therefore, while the noise levels provide information as to the noise exposure at a given location, the relative noisiness of the two facilities cannot be compared directly. It should be further noted that noise levels throughout the study area are above the levels deemed desirable for residential development by the County of San Francisco. However, the impact analysis for the various alternatives indicate that noise levels in the South Beach/Rincon Hill area would not go up a significant amount (that is, more than 2 dBA) under any of the alternatives. Noise levels in the Ferry Building area, would decrease because of the removal of the freeway. As noted in the DEIR, this decrease would be a result of removing the reverberant chamber created by the overhead structure.

Noise barriers were not considered feasible along surface roadways for this project due to the many requirements for access from adjacent properties. Additionally, the barriers, even if they could be incorporated, would have to be extremely tall to shield the upper floors of the projects along The Embarcadero. As noted in the DEIR, in an urban situation, the best way to shield people from urban noise is to design the structures to reduce the intrusion of outdoor noise levels.

TOSTA & BROWNING
LAW CORPORATION
SUITE 2230
333 MARKET STREET
SAN FRANCISCO, CALIFORNIA 94105
(415) 957-1031

November 21, 1984

OUR FILE

FTFH-2

Mr. William Chastain
Caltrans
Post Office Box 7310
San Francisco, California 94120

Comments on Draft EIR
for I-280 Transfer Concept Program

Dear Mr. Chastain:

We represent a number of property owners whose interests would be effected by the I-280 Transfer Concept Program. On behalf of those clients, we make the following comments on the Draft EIR for the I-280 Transfer Concept Program.

1 First, the economic growth projections (employment, land use, etc.) used in making transportation forecasts do not appear to be consistent with the growth scenario used to develop the transportation projections in the Downtown Plan EIR recently certified by the San Francisco City Planning Commission. While the difference between the I-280 transportation projections and the Downtown Plan projections is only 4-7% (see DEIR Downtown Plan, Vol. No. 3, Comments and Responses, Part II: Responses, p. C&R-E.4.), the land use, economic and employment forecasts which form the basis for the transportation projections were significantly different. Why would two different data bases and theoretical models lead to such similar results? We would like an explanation of the forecasting methodologies used in the two DEIRs. We would like a comparison of the two methodologies. Why was not a single methodology employed for both?

2 Second, the proposal under Alternative V.A., involving siting a new Peninsula Commute Service (PCS) train terminal in an underground station next to the existing Transbay Bus Terminal, is inadequately analyzed in the Environmental Impacts and Mitigation chapter of the DEIR. In particular, the social and community environmental impacts and mitigation of this new PCS terminal location were omitted. Similarly, Alternative V.A. appears to be almost forgotten in the Physical Environmental Impacts and Mitigation section of the DEIR. The PCS extension and the new terminal construction should be specifically addressed in this section of the DEIR.

3 Third, the DEIR itself admits that it does not include a detailed analysis of the regional impacts of each alternative. (p. at I-16.) This is a fatal defect for an information document to be used in the evaluation of transportation alternatives with obvious regional impacts, especially when Caltrans is the Lead Agency with the mandate of evaluating alternatives from a regional or state-wide perspective. We ask that a regional evaluation of the alternatives be undertaken and included in the I-280 EIR.

4 Fourth, it seems to us that Alternative V.A. would be far more cost-effective if either (1) the proposed PCS underground terminal was jointly built by Caltrans and the property owners of the site as a joint development project or (2) individual property owners are allowed to develop their individual sites as long as their development will accommodate or facilitate the terminal and eventual extension of the PCS line to the site. Both of these alternatives involve cooperation and joint public/private sector planning and bargaining instead of condemnation. These alternatives should be addressed in the EIR.

5 We are also enclosing the "Request for Final Environmental Impact Report" that was attached as a self-mailer to the DEIR. As indicated on that Request, please send this firm both (1) a copy of the final EIR as approved by the City and County of San Francisco and (2) a copy of the final EIR as processed by Caltrans. In addition, please supply us with (3) a copy of the Comments and Responses to the DEIR when published.

Sincerely,

J. Frederick Clarke, Jr.

JFC/de
Enclosure

TOSTA & BROWNING
Law Corporation
Suite 22X
333 Market Street
San Francisco California 94105
(415) 957-1031

RESPONSE TO COMMENT LETTER G-8

G-8.1: As explained on page IV-68 of the DEIR, projections of future travel demand for the downtown area assumed an increase in downtown employment of 95,700 persons between 1979 and 2000. This is the growth expected if San Francisco maintains its current share of regional growth as estimated by City, ABAG, and MTC staff in the Downtown Transportation Improvement Program (DTIP). The DTIP encompasses areas that have or are projected to experience significant employment growth as shown in Figure IV-20 (page IV-69). Since the base period for travel demand analysis is 1982, the DTIP growth projection of 95,700 was reduced to 81,200 to reflect estimated growth in the 1979-82 period.

Using input from the DTIP, downtown employment growth was translated into increased corridor travel demand as follows: First, projected new employees were apportioned among San Francisco and other Bay Area districts based on projected housing growth and downtown worker occupancy rates. (Districts consist of East Bay, South Bay, North Bay and four sectors of San Francisco.) Independent estimates were made for San Francisco and non-San Francisco resident employees, and these were normalized to the total of 81,200 new employees. The San Francisco share is based on a projection of 20,000 net new dwelling units within the City by 2000. Projected new employees by corridor were then converted to daily commuters (i.e., highway and transit travelers only) using factors from observed 1975 travel data. Total new peak two-hour person trips were then estimated by applying ratios of peak period to daily trip-making and ratios of work trips to all trips, by corridor, based on 1981 travel data. Finally, transit shares of peak-period person travel were assigned based on existing mode choice in each corridor.

The travel demand projections for the I-280 study were completed at a time when the Downtown Plan was still in progress. Although the two projections followed the same general approach in forecasting future increases in travel demand, they differ in base year, size of area covered, level of employment growth, and certain assumptions regarding residential and travel distribution. The differences in employment growth are: The Downtown Plan projects an increase of 91,260 jobs between 1984 and 2000 in the City's C-3 district; the

DTIP projects an increase of 95,700 jobs between 1979 and 2000 in a larger downtown area which includes the C-3 district. Adjusting for the difference in time period, the DTIP employment projections are about 19,000 jobs less than the Downtown Plan projections. When further adjusted for the difference in geographic area, and other differences, and translated into travel demand, the Downtown Plan projections could be 20% - 30% higher than the DTIP projections in future increases in travel demand for the C-3 district. It should be noted, however, the projected increase in travel demand amounts to about 27% of the existing travel in downtown. Thus, in terms of total travel demand the difference between the two projections would be only 4% - 7%.

G-8.2: Comment noted. The DEIR addresses impacts and mitigations at the "system" level, in contrast to the "project" level. The social and community impacts and physical environmental impacts of Alternative V-A, of which the PCS extension and terminal is an element, have been addressed at the same level of detail as other alternatives. However, specific discussions on the PCS extension and terminal were included in the DEIR (see pages V-6, V-7, V-12, V-13, V-19, V-23, V-24, V-82, V-83 and V-111). More detailed project level information will be developed as part of project design for selected projects.

G-8.3: The I-280 TCP study examines transportation improvements concepts for the I-280/Embarcadero corridor in San Francisco. Consistent with this purpose, the study addresses the impacts of corridor transportation improvements on all corridor users, including regional travelers; but does not address issues, policies or plans related to the regional transportation system. The regional issues can only be adequately addressed by studies of a regional scale. The Peninsula Mass Transit Study mandated by SCR-74 is one such study. Because of the limitations of the I-280 study with respect to regional issues, it was stated in the DEIR (see Notice following the title page) that no decision will be made with respect to any transit elements that involve the San Jose - San Francisco Transit Corridor pending completion of the SCR-74 study.

However, the impacts of corridor transportation improvements on regional travelers using the corridor have been adequately addressed in the DEIR. These impacts were addressed in the DEIR in terms of changes in availability

and access to regional transit services (Sec. V.C.), impact of Embarcadero Freeway removal on commuters from the East Bay and Peninsula areas (Sec. V.C), and peak period transit and highway travel times for representative regional trips (Table E-1, page A-43, and Table E-6, page A-48). The impact of each alternative on affected approaches to the regional freeway system were also discussed on Table V-10, page V-64.

G-8.4: The potential for joint development of the PCS underground terminal is discussed on page V-39 of the DEIR. If this element is part of the selected alternative, more detailed consideration would need to be given to the joint development option as well as individual development within overall guidelines.

G-8.5: A copy of the Final EIR will be sent as requested. The Summary of Comments and Responses is a part of the Final EIR.

MISSION CREEK CONSERVANCY

November 26, 1984



Mr. William Chastain
CALTRANS
PO Box 7310
San Francisco, CA 94120

Dear Mr. Chastain,

This is to comment on the draft Environmental Impact Report for the I-280 Transfer Concept Program in San Francisco.

p IV-32 2. Population and Affected Social Groups c. Neighborhoods

1 comment: No mention is made of the Mission Creek Harbor neighborhood. Twenty houseboats and thirty-five other craft are harbored here under lease with the Port of San Francisco and permit from the SF Bay Conservation and Development Commission.

This is an active, cohesive community and an active member of the Coalition of San Francisco Neighborhoods.

Boats at the upper end of the harbor are directly affected by some of the improvements. The entire harbor will be affected by construction.

The publication MISSION CREEK SAN FRANCISCO documents in part the community and the natural tidal ecology, and is enclosed to illustrate this community and the ecology, commented further below.

pp IV-93 & 96 2. Hydrology and Water Quality

2 comment: Water quality in China Basin channel is based in the EIR on 1979 sampling without mention that coliform content in the channel has been reduced to a major degree in succeeding years due to a reduction by ten times of the combined storm/sanitary overflows in the five years between 1979 and the present resulting from sewer improvements including placing the Channel Pumping station on line.

3 comment: citation of "about 60 uncontrolled wet weather discharges in the China Basin area" is significantly erroneous based on discussions with Mr. Donald Birrer, Director of the Clean Water Program (San Francisco), who states that present uncontrolled discharges number about six per year. This major reduction is verified by channel residents.

pp IV-105, 106 6. Ecology

4 comment: The degradation of China Basin Channel is grossly overstated and ignores recent improvements in water quality (ref prior comment) and its present wildlife habitat is grossly understated. A growing population of magnificent

300 CHANNEL STREET #21 SAN FRANCISCO CALIFORNIA 94107 (415) 621-6774

seabirds nests in the area. The enclosed book illustrates some. A great blue heron with six foot wingspread took up residence in the channel over six months ago and lives there now. Night herons number over a dozen. For at least the past five years, the family of common egrets, with five foot wingspread, illustrated in the enclosed book, have lived and multiplied. The channel is alive with pile perch, sardines, and other fish. Enclosed also is a list of native plants recorded in a survey in 1983.

This sheltered tidal channel presently constitutes a micro-climate and ecology that is unique to San Francisco, valuable particularly considering its proximity to downtown. The treatment of its present and potential value in the EIR is misleading and grossly erroneous.

p V-104 & V-123 Ecological Impacts

5 comment: The section on p V-123 understates the damage of construction to the present population of shorebirds and fish, which is more accurately stated on p V-104.

p V-110 F Construction Impacts and Mitigation

6 comment: No statement is made as to the impacts of construction on the Mission Creek Harbor community, yet severe impacts would result from many of the Alternatives and substantial mitigation measures would be required.

[end]

John A. Davis
President

ACACIA	ACACIA BAILEYANA
ACACIA	ACACIA BURBUREA
AVOCADO	
BAMBOO	PHYLLOSTACHYS AUREA
BOTTLE BRUSH	CALLISTEMON CITRINUS
CAMELLIA	
CHRYSANTHEMUM	
COMMON FENNEL	FOENICULUM VULGARE
COTONEASTER	
EUCALYPTUS	
GERANIUM	
FLOWERING MAPLE	ABUTILON HYBRIDUM
HEAVENLY BAMBOO	NANDINA DOMESTICA
JADE PLANT	CRASSULA ARGENTEA
LOBELIA	
LUPINE	LUPINUS ALBIFRONS
MAGNOLIA	MAGNOLIA GRANDIFLORA
OLEANDER	NERIUM OLEANDER
PAMPUS GRASS	CORTADERIA SELLOANA
PEACH	PRUNUS PERSICA
PINE	PINUS CANARIENSIS
PRIVIT	LIGUSTRUM
ROSEMARY	ROSMARINUS OFFICINALIS
WILD RADISH	RAPHANUS SATIVUS
SIBERIAN IRIS	IRIS SIBIRICA
SORREL	OXALIS CORNICULATA
VIOLA	
WILLOW	SALIX BABYLONICA

BRUSSEL SPROUT
CABBAGE
CARROT
LETTUCE
MINT
NEW ZEALAND SPINACH
STRAWBERRY
TOMATO

This brief list of the flora and fauna in the vicinity of Mission Creek was made in early 1983 by direct observation under the guidance of Zach Stewart, Landscape Architect of Canessa Park, San Francisco

EGRET	SKATES	JACKRABBITS
HERON	SAND SHARKS	GROUND SQUIRRELS
CORMORANT	SEA LION	SHORE RODENTS
GREBE	SEA OTTER	
DUCK	RUBBER LIPS	
SHOREBIRDS	BASS	CLAMS
SEA GULL	ANCHOVIES	MUSSELS
	PERCH	WORMS
	FLOUNDERS	

RESPONSE TO COMMENT LETTER G-9

G-9.1: The following sentences are added to the first paragraph on page IV-34: "At the upper portion of the China Basin Channel, the Mission Creek Harbor neighborhood harbors twenty houseboats and thirty-five other craft under lease with the Port of San Francisco and permit from the San Francisco Bay Conservation and Development Commission. This is an active, cohesive community and a member of the Coalition of San Francisco Neighborhoods." Only Alternatives IV or IVA would involve demolition/construction over the channel at China Basin. Under these alternatives the existing I-280 Freeway structure and its on/off ramps would be removed in the vicinity of the upper part of Mission Creek Marina. A new off-ramp would cross the channel east of the Channel Pumping Station and a potential Muni-Metro extension to Mission Bay would necessitate bridging the channel at Sixth Street.

Other possible activities near the channel include track removal adjacent to the channel between Fourth and Fifth Streets (Alternative III); take-down of the freeway structure between Third and Fourth Streets, 160 feet from the channel at its closest approach (Alternative III); new on-ramp construction between Seventh Street and the Channel Pumping Station (Alternatives IV, IVA); take-down of freeway structure northeast of Sixth Street, between 40 and 75 feet from the channel (Alternatives IV, IVA); take-down of freeway structures northeast of Third Street, about 300 feet from the channel (Alternatives V, VA, VI).

As stated on page V-110 of the DEIR, the alternatives would produce varying degrees of short-term inconvenience and disruption of activities. The discussion of construction process and timing (pages VI-110 through V-112) can be generally applied to the China Basin segment of the project. Traffic would be diverted during work hours; some intersections would be closed for five to six days (on a rotating basis); structures parallel to the demolition/construction activities corridor would be protected by falsework, fence fabric or other means; touch-down ramp construction would take 12 to 15 months; at-grade construction would require three to four months in each location; total construction period for the entire length of the project would range between 38 and 42 months, depending on which alternative is selected. Mitigations for process and schedule are discussed on pages V-127 and V-129 of the DEIR.

Noise and vibration impacts in the China Basin Segment are discussed on pages V-113 through 115 of the DEIR; mitigations are on page V-129. Vehicular and Pedestrian Access, Water Quality/Hydrology, Air Quality, Ecology, Solid Waste and Energy effects are also discussed for the various alternative proposals in Chapter V of the DEIR. The mitigations proposed may generally be applied to any segment of the corridor with some modification for individual segments depending on which alternative is selected.

G-9.2: The coliform content of China Basin channel has been considerably reduced since 1979 as a result of a reduced number of uncontrolled wet weather discharges and the startup of the Channel Pumping Station. The San Francisco Clean Water Program monitors daily and monthly coliform counts at four sites within the channel as required by the Regional Water Quality Control Board. In the 1983-84 survey year, the coliform count did not exceed the standard for water contact sports (1,000 MPN/100 ml) during June, the mid-dry season month. The standard was exceeded 88% of the time during November, the highest rate for the wet season. Actual counts supplied by the Water Department indicate that June MPN at the channel month varied from less than 30 to 430 (average count less than 83). The average count for all four channel station readings for the month was less than 205. The average November count from all four channel stations was greater than 7,000, but since these counts included more than a dozen in excess of 24,000 MPN, it is not possible to firmly establish the upper limit. It is obvious, however, that the coliform count has improved by several orders of magnitude since 1979. Flushing and mixing action of tides generally clears the channel completely within two days. (Coliform counts supplied by Caroline Karp, Water Quality Division, San Francisco Water Department, 30 January 1985.)

The following sentence is added on page IV-93, fourth full paragraph, following the third sentence: "(The coliform content of the channel has reduced by several orders of magnitude since 1979 as a result of a reduced number of uncontrolled wet weather discharges and the startup of the Channel Pumping Station.)"

G-9.3: The number of uncontrolled wet-weather discharges listed on page IV-96 of the DEIR is correct for the period prior to the construction of the Eastside Collection System (60 in the Central Bay (China Basin) Zone). The number of permitted uncontrolled wet-weather discharges in the Central Bay Zone (10) is also correct. San Francisco Clean Water Program confirms that the average number of uncontrolled wet-weather discharges is now about six per year (Steve Langhlin, Public Relations Officer, SFCWP, telephone communication, 29 January 1985). This is a significant reduction when compared to pre-construction conditions. On-site observations by residents along the channel also indicates that about six spills occur per year and that the channel is significantly cleaner than it was two years ago (Robert Isaacson, Mission Creek Conservancy (TAC member), telephone communication, 25 January 1985).

G-9.4: All statements regarding the water quality of China Basin are cited to the Regional Water Quality Control Board and California Department of Fish and Game. The improvements in the sewage overflow situation, and thus water quality, in China Basin are noted above and on pages IV-106 and 107.

The additional species found on the site are noted. None of these species significantly changes the relative value of the habitat when compared to other wildlife habitats around the Bay.

The "native" plant list attached to the comment has about 32 non-native landscape and garden species, all of which can be incorporated into a landscaping plan for any development in the area.

The "unique" values of this site in San Francisco would not be jeopardized by the proposed project.

G-9.5: For the sake of brevity and in an effort not to repeat issues and analysis, the discussion in the construction section were purposefully brief.

G-9.6: Generalized construction impacts and the potential duration of construction in the China Basin segment of the I-280 Corridor are discussed above (G-9.1) and in the DEIR. Identification and mitigation of specific construction impacts cannot be determined until an overall implementation program is developed, and specific projects are designed and, in turn, assessed via the environmental process.

Peninsula Rail 2000

November 26, 1984

W.B. Chastain
Caltrans, P.O. Box 7310
San Francisco, Ca. 94120-7310

Dear Mr. Chastain:

Peninsula Rail 2000 objects to the I-280 Transfer study findings for the following reasons:

1. The study gives an unfair and misleading view of the concept of a Downtown extension of Peninsula trains.
2. It overestimates the value of a Muni Metro extension for Peninsula commuters, and
3. It examines only the Caltrans proposal for extending trains, a proposal which is unworkable, and whose adverse environmental impacts are not fully described in the document.

Peninsula Rail 2000 strongly favors a Downtown train extension because this project is a prerequisite for survival and upgrading of the Peninsula line to rapid transit standards. The chart on page A-44, which shows an increase in ridership of 45% by the year 2000, <u>even if nothing is done</u>, is ridiculous. As we've seen in the past 20 years, dramatic increases in travel demand have <u>not</u> led to increases in train ridership. Instead, the opposite has happened. Travel has gone up while ridership has gone down. The lack of a proper Downtown station has held ridership artificially low and is likely to
1 continue to do so in the future. Table IV-12, which calls 5500 passengers the "existing demand" is misleading. This is actually the existing <u>ridership</u>, which has nothing to do with demand. A proper passenger demand estimate could better be made by comparing an upgraded Peninsula service to the BART service area. Similar demand should exist on the Peninsula. In its demand estimates for a service upgraded to transit standards, Peninsula Rail 2000 has predicted more than twice the number of San Francisco trips that are shown in the EIR. The consultant's underestimates result from his faulty methodology described on page IV-66. Here he says that "transit shares of peak-period travel were assigned <u>based on existing mode choice</u> in each corridor." If similar assumptions had been made before BART was

PO Box 3552-RinconAnnex, San Francisco, CA 94119

built, predictions would have been far below the 80,000 daily trips that are taken on the Concord-San Francisco line daily.

Although the EIR is not supposed to take sides, it is set up so that the Muni Metro Extension to 4th and Townsend is overvalued. The whole tone of the report is demonstrated by two erroneous statements, one on page V-47 which says that "Peninsula Commute Service ridership would be increased [with the Muni Metro extension] by 20% over ridership under Alternative I (the do-nothing alternative) due to improved transit feeder service." and another on page VIII-29 which says, "...extension [of Muni Metro] to the SP Depot would facilitate travel for users of the commuter railroad to/from the southern portions of San Francisco, San Mateo and Santa Clara Counties..." The Muni Metro extension is a good project for serving south-of-Market development, but it will do virtually nothing for Peninsula commuters because it requires the same additional cost and travel time inconvenience as existing bus service. In fact, the existing Muni 15, 30 and 42 Gold buses would still provide faster and more direct service to their respective areas than the rail line.

2

Because these statements are wrong, they should be deleted along with the ridership projections in Table E-2 on page A-44. These show 9100 trips using the Metro for "SP Depot access." This is more than the total transit ridership to and from 4th and Townsend today, with no increase in service and no guarantee that the Peninsula service can survive in its present form.

The travel time tables on page A-45 are also slanted in favor of the Muni Metro extension. Oakland to San Mateo, with a Downtown train extension is 89 minutes. The same trip with a Muni Metro extension is 91 minutes, only two minutes' difference, despite the elimination of a transfer. This table also shows travel times between the Transbay Terminal and San Mateo via the Peninsula Commute Service ranging between 59 and 63 minutes, even though the slowest existing train takes 34 minutes to make the trip. SamTrans travel times are shown as ranging between 57 and 67 minutes even though the fastest existing bus takes 70 minutes.

3

Our final point concerns the EIR's consideration of only Caltrans' proposals for Downtown train extensions. The Transbay Terminal proposal is unworkable

for a variety of reasons, many of which are cited in the report. On page V-28 the report claims that the Peninsula extension would displace 73 businesses and 3 parking lots employing between 500 and 1700 workers. Yet Caltrans has no authority to acquire land for transit purposes through eminent domain so the likelihood of any displacement is small. On page III-65, the report says:

> "While technically feasible, the subway alignment for the CalTrans extension would be expensive to construct because of undesirable soil conditions and potential conflicts with major existing utilities. It could also have short-term, as well as long-term, impacts on the proposed housing development in the South Beach sub area of the Redevelopment project. Therefore, although not examined in detail in the I-280 study, alternative alignments and terminal locations for the proposed extensions should be investigated further should this project be advanced for further development."

4

Caltrans, however, refuses to look at other alignments, even though it has already changed its position on the extension five times. Finally, in Chapter VII, a long discussion of environmental impacts includes nothing about the impacts of running diesel trains in a long underground tunnel. Running diesel trains in subways isn't done anywhere else in the country, nor perhaps the world, yet Caltrans intends to do it in San Francisco, without describing the environmental impacts.

The fact that Caltrans sponsored the I-280 EIR, which is so heavily biased in favor of a Muni Metro extension and against a train extension, leads Peninsula Rail 2000 to doubt the state's interest in continuing to run the Peninsula trains. The lack of any firm long-term commitment in Caltrans' recently released Long Range Plan for the trains reinforces this suspicion. Without Caltrans' commitment to public transportation, none of the transit improvements in the project are likely to survive as long as the present institutional framework continues. That is why Peninsula Rail 2000 has called for creation of a special district to operate the service, and is the only organization with a comprehensive long range plan for its improvement which answers the concerns raised in the EIR

5

Sincerely,

Richard Hood

Richard Hood

RESPONSE TO COMMENT LETTER G-10

G-10.1: The methodology for projecting Peninsula transit ridership utilized the best data then available, and has been reviewed extensively by various agencies, including MTC, Caltrans, and the City of San Francisco. More importantly, the methodology was applied consistently across all alternatives. It therefore provides a fair, objective and consistent way of comparing alternatives for their ridership potential.

Peninsula Rail 2000 is correct in stating that the DEIR projects a 45 percent increase in Caltrain (PCS) ridership between 1980 and 2000 for Alternative I (which does not include a PCS Extension nor Muni Metro feeder service improvements). However, it is incorrect to say that this alternative assumes "nothing is done". The following service improvements and other factors were considered in making the transit ridership projections:

a) An increase of over 81,000 employees was projected for downtown San Francisco over the 1982-2000 planning period, some 16,000 of which were projected to live in Peninsula communities (see Working Paper 1.5.6, July, 1983, Chapter II). This alone would contribute to an increase in PCS ridership of 25 percent, assuming no change in the relative shares of travel by each transportation mode in the corridor.

b) Study Alternative I (like all study alternatives) presumes completion of certain line and station improvements outside San Francisco that would improve access to Caltrain along the Peninsula (see Caltrans Commuter Rail Station Location and Improvement Study, Barton-Aschman Associates, 1982.).

c) Alternative I (again like all study alternatives) further presumes replacement of the existing fleet of train cars by new higher-capacity cars.

d) An important factor in the projections is that the Peninsula corridor freeway system into downtown San Francisco has a finite vehicular

capacity that has virtually been met already. Therefore, future increases in travel demand must be largely met by the available corridor transit systems (PCS, BART, SamTrans). The methodology reflects this by "diverting" projected excess vehicular demand to PCS, BART, SamTrans, and carpools. This is applied across all alternative modes in proportion to their relative shares of usage. This is only done for peak period (commute) travel since this is when the highway capacity limitation is reached. In Alternative I, proportionately less of the excess vehicle demand was assigned to PCS than for other alternatives; nevertheless, the projected diversion contributed significantly to the overall ridership growth, accounting for a 13 percent increase during the peak commute periods over the "unconstrained" projection.

Peninsula Rail 2000 is correct in that the 5,500 "existing demand" would be better referred to as "ridership". However, it would be an oversimplification to compare the PCS line to the BART system. The I-280 study team is not aware of the methodology or assumptions used by Peninsula Rail 2000 to predict twice as many riders on an upgraded Peninsula service as compared to the DEIR. However, the study team's analysis of previous projections by others for the PCS Extension (discussed in Working Paper 1.5.6, chapter III) indicates that such high ridership projections imply a significant net reduction in peak period auto trips in the Peninsula corridor into San Francisco. If this were to happen, the improved level of service on the freeways would make transit less competitive in the corridor and, hence, would be expected to reduce transit ridership from the predicted levels.

Transit shares were not assigned solely based on existing mode choice; existing mode choice was only used as a starting point. For each alternative, modal shares were revised to reflect the specific station and line improvements within the corridor as well as the diversion of excess highway demand to the available corridor transit modes (PCS, BART, SamTrans) as noted above. For Alternative I, for example, 76 percent of the Peninsula corridor travel growth was assigned to transit modes whereas the existing (1982) transit share was estimated to be only 34 percent for the downtown San Francisco to Peninsula corridor as a whole. This process is described in more detail in Working Paper 1.5.6 (pages II-31 and III-27).

G-10.2: A 20 percent increase in ridership over Alternative I is projected and, as stated in the DEIR, this is largely attributable to improved transit feeder service associated with the Muni Metro extension. The study team does not agree that this is an erroneous statement; it is a projection based on a systematic methodology consistently applied across all study alternatives, including those incorporating the PCS Extension.

The Muni Metro extension would improve feeder service over existing bus connections in several ways. First, it would establish high-capacity rail transit service as the primary feeder mode, thereby avoiding the existing crowded conditions which requires some riders to wait for a second bus to get into downtown San Francisco. Service would be frequent, further ensuring the waiting time is kept to a minimum. Provision of a Muni Metro station adjacent to the SP depot would potentially make the transfer easier and safer than at present. By virtue of larger seating capacity, the access trip would be more comfortable. Rail service would not be subject to surface street traffic delays to the extent that buses are, and this would reduce in-vehicle times. It is true that the existing Muni 15, 30, and 42 Gold buses can provide faster and more direct service to some areas, but the calculations assume that in these cases the bus feeder service to the depot would also be retained as appropriate. Hence the Muni Metro would not necessarily replace all existing bus feeder service but rather supplement it. Considering this, it would seem quite reasonable that the Muni Metro would increase Caltrain ridership into San Francisco by 20 percent, particularly considering how important most riders perceive the transfer and feeder part of an overall commute trip. Of course all of the projections (including those for other study alternatives) assume that the Peninsula service continues to operate and, further, that other PCS improvements outside San Francisco, as noted in the previous response, are effectuated. The study team does not agree that the statements in the DEIR are wrong nor that the ridership projections in Table E-2 should be deleted.

G-10.3: Several logical assumptions were made for the travel time analysis which affect the times in question. Alternatives V and VI incorporated a PCS

Extension to the Rincon Annex site. Only Alternative V-A includes the proposed extension to the Transbay Terminal, including the track alignment proposed by Caltrans. The analysis for the extended PCS service reflect that trains would still stop in the vicinity of Fourth and Townsend, to more conveniently serve the Civic Center area and the proposed Mission Bay development. As a result, the running times include a station stop near Fourth and Townsend, and an average speed of 20 miles per hour was used for the distance between the existing depot site and the downtown terminal. Although there may be some express trains to the downtown terminal if the extension is built, the travel time analysis was intended to evaluate average conditions.

The SamTrans schedule in effect at the time of the analysis listed a run time of 46 minutes for the 7F bus between Transbay Terminal and the Bayshore Freeway at Third in San Mateo. The I-280 Transfer Concept Program explicitly includes programs to improve Peninsula bus service, such as the Second Street bus lanes and new freeway ramps to I-280. These improvements were included in the travel time estimates wherever appropriate.

The Oakland to San Mateo travel times for Alternatives I through IV-A (91 minutes) reflect that passengers will transfer between AC Transit and the SamTrans express service at the Transbay Terminal. Only the PCS Extension makes the PCS service at all competitive for this particular trip.

As noted in the footnote to the travel time table, the travel times are door-to-door and include access, wait, in-vehicle, transfer and egress times. For example, the Transbay Terminal to San Mateo travel time under Alternative V includes 6 minutes of walking to Rincon Annex, a 5 minute wait, 36 minutes on the train and 5 minutes to drive home from the San Mateo station. The Transbay Terminal location reduces the walk time by 2 minutes. The SamTrans travel time includes 3 minutes of walking, a 10 minute wait, 36 minutes on an express bus (using the proposed Second Street bus lane and the proposed I-280 freeway ramps at Second) and 8 minutes to drive home from the stop adjacent to the Bayshore Freeway at Third in San Mateo.

The MUNI Metro extension is competitive with the PCS extension in terms of travel time because it provides direct service to large area of downtown (all along Market Street). Also, small electric transit vehicles can move quickly over short distances (i.e. Fourth and Townsend to Market Street) because of their quick acceleration and deceleration rates compared to full size diesel trains. However, the transfer time between PCS and MUNI Metro is considered a major inconvenience and was weighted by a factor of 2.5 in the patronage analysis. This weighting is not reflected in the travel time tables.

G-10.4: The DEIR describes the concept of the PCS extension and addresses its impacts and mitigations. As explained in the document, if selected for further development the concept will be subject to detailed design which will include refinements or alternative designs of alignments and terminal locations. More detailed information on the environmental impacts and mitigations of the proposed design will be available for review during project-level environmental clearance.

Operating diesel trains underground is an existing technology and impacts can be mitigated by careful planning and design. Union Station in Chicago for example, operates diesels under an air rights development complex with specially designed ventilation. Electrification of the entire PCS line is in the state's long-range plans. Engineering studies would be undertaken at the time the project is designed in detail to plan an adequate ventilation system to provide for the comfort and safety of train passengers and station users. The ventilation system exhaust vent would be designed to result in sufficient dilution so that ambient air quality standards are not violated in its vicinity. As a result, no significant air quality impacts would be predicted to result from the operation of diesel trains in the tunnel.

G-10.5: Comment noted. It is contrary to Caltrans plans for the upgrading of the PCS line.

People for Efficient Transportation

Robert F. Coleman, chairman
(408) 294-2515

2110 Mangin Way
San Jose, California

W.B. Chastain
I-280 Transfer Concept Program EIR
Caltrans, P.O. Box 7310
San Francisco, CA 94120-7310

November 27, 1984

Re: Draft E.I.R. Public Hearing 11/15/84

We wish to write for the public record our position regarding this Program's options as a followup to our written and oral comments at the 11/15/1984 public hearing.

1 1) We support the study, addition, and implementation of the I-280 connection to I-80/SR 480 (as originally adopted) because of the systemwide freeway/street benefit such a junction would have to San Francisco and its transportation network.

2 2) We oppose any alternative which removes any portion of the existing roadway on either side of the I-80 corridor.

3 3) If the above is not obtainable, we recommend adoption of alternatives II and/or VI.

4 4) We feel the above options are the minimum necessary to help alleviate the air pollution which permeates the whole Bay area. This smog is the result of the inadequate road capacity and automobile congestion in the S.F. downtown/U.S.101 area. Furthermore, there is no valid comparison within the DEIR of the impact of a freeway (I-280) to freeway (I-80) connection on city street, Central Freeway or US101, relating to noise, vehicular and pedestrian accidents and safety, and other environmental, social (especially neighborhood and local business) and financial issues. Approximately 85,000 cars per day (ADT) must compete on overburdened city streets and US101 to get into downtown S.F. as a result of the unconstructed link from I-280 to I-80 (This is based on an analysis of Caltrans' Hwy. Volumes book (1983)). The impact of these vehicles represents a significant environmental factor to San Francisco's environmental quality, especially in the congested downtown area.

(over)

5) The ommission of the I-280 extension is a fatal flaw to the study and therefore should be included. Alternatives II and VI, partially offset some of these concerns but are not comprehensive enough to totally mitigate the impacts of the loss of the I-280 extension to I-80.

5 We further suggest that a busway/freeway combination (as the Los Angeles or Shirley Highway Busways) should have been studied on I-280 to I-80 from the US101 (Alemany Interchange) area.

People for Efficient Transportation also suggests that wherever Light Rail (streetcar) transit extensions are planned, Roadway Powered Transit buses should be considered as their alternative, or, regular overhead powered trolly buses. This will provide

6 valid comparison data for decisionmakers to determine feasibility of streetcar versus electric bus transit. This study should have included such analysis. That ommission represents a further degredation of this DEIR alternatives analysis.

Please include this letter in your final I-280 Transfer Concept Program Draft Environmental Impact Report

Omar Chatty
Public Affairs Director

cc. UMTA
MTC
FHWA
SF Chronicle
SF B of S
SF City Council

RESPONSE TO COMMENT LETTER G-11

G-11.1: Comment noted. Please see Response to Comment G-5.1, which is the same comment from the same Commentator.

G-11.2: Comment noted.

G-11.3: Comment noted.

G-11.4: Comment on the environmental impacts of not completing the I-280/I-80 link is noted. For reasons explained in Response to Comment G-5.1, this freeway connection was not the subject of the DEIR.

G-11.5: Comment noted. Please see Response to Comment G-11.4.

G.11.6: The Muni Metro extension included in the alternatives is an extension of the existing rail line. A bus mode for this extension is not consistent with the objectives of this extension. Bus connections to Metro service currently exist. A bus alternative to the proposed Muni E-Line streetcar service is included in the analysis (Alternative II). However, an electric trolly bus alternative for E-Line was not studied due to limitations on the number of alternatives that can be possibly analyzed within the scope of this study. Comparative data on LRT, diesel bus and electric trolly are available from Muni.

SHUTE, MIHALY & WEINBERGER
ATTORNEYS AT LAW
396 HAYES STREET
SAN FRANCISCO, CALIFORNIA 94102

E. CLEMENT SHUTE, JR.
MARK I. WEINBERGER
MARC B. MIHALY, P. C.
ALLETTA D'A. BELIN
FRAN M. LAYTON

TELEPHONE
(415) 552-7272

November 27, 1984

Mr. William Chastain
CalTrans
P.O. Box 7310
San Francisco, CA 94120

Re: Comments on the I-280 Draft Environmental Impact Report

Dear Mr. Chastain:

The Mayor's Embarcadero Citizens Committee hereby submits the following written comments on the I-280 Draft Environmental Impact Report.

The Environmental Impact Report is generally a thorough and commendable document.

1 It is our reading of the Environmental Impact Report that Alternative No. 4A emerges as the overall preferred alternative. Although the material which leads to this conclusion is included in various tables and text, it is nowhere clearly summed up. We have prepared a draft table, indicating the rank order of the alternatives as derived from the performance of each alternative in the major goal areas. (See Attachment A). We would request that this table be evaluated, its assertions responded to, and the material included in the EIR.

2 Although the Draft EIR mentions the Downtown Plan, it does not clearly indicate which of the alternatives is consistent or inconsistent with the Plan and in what respect. Also, the EIR does not clearly indicate which of the alternatives is the preferred alternative from the point of view of consistency with the Downtown Plan. Since, by the time of the preparation and issuance of the Final EIR, in all likelihood the Planning Commission will have approved the Downtown Plan, the inclusion of a precise and clear ranking of the alternatives in terms of their consistency with said plan is essential. Similarly, although the Draft contains a somewhat more complete discussion of the Northeast Waterfront Plan, it fails to clearly indicate which of the alternatives from an overall perspective is most consistent with the goals of that plan. We would request that charts

indicating such consistency be developed.

The Draft EIR contains a substantial discussion of the impacts of the various alternatives on street-level traffic. We have one suggestion with respect to that discussion and also one request for further analysis. Several of the maps which showed total queuing on San Francisco's surface streets, indicate existing or projected queuing on the Embarcadero elevated freeway with a different graphic treatment. The result is that the reader overlooks the fact that much of the queuing shown on those illustrations is not new to San Francisco, but rather the transfer of queuing that currently exists on the Embarcadero elevated freeway to surface streets. We suggest that this error be rectified, and the queuing situation on the elevated freeway emphasized.

3

In addition, in our oral testimony we refer to the 1983 San Francisco Metropolitan Traffic District Cordon Count. The Cordon Count was conducted by JHK & Associates for the San Francisco Department of Public Works and is the single document containing actual data regarding all day traffic counts of persons and vehicles entering and leaving the downtown area, as opposed to projections. One of the interesting results of the Cordon Count is an indication that surface traffic on San Francisco Streets has decreased slightly since 1965. (See Attachment B). Yet this Draft EIR contains predictions of substantially increased surface traffic under all alternatives, including the status quo. Please explain the apparent contradiction, and show in chart form what surface traffic under Alternative 4A and the status quo would look like using the conditions of the Cordon Count.

4

Finally, the Draft EIR contains substantial information on the cost of each of the alternatives. Again, we would request a modification and certain additional work. Much of the cost information is not presented in a meaningful manner because the cost of the various alternatives is distorted by the inclusion of various portions of the CalTrain option. Although the cost of CalTrain is interesting to the readership generally, it should be broken out so that the fundamental group of projects involved is costed out. It would also be advisable if those project costs could be related to various reasonably anticipated funding sources. For example, as part of Mission Bay, there is a substantial possibility that Southern Pacific may pay for a part of the project elements related to the touchdown of Interstate 280. In addition, funds outside the scope of the Interstate Transfer Program may also be available for various project components. These funding

5

sources should be described in the Draft EIR. Project components which are not eligible for transfer funds such as parking facilities, should also be called out and appropriate funding sources identified for each. Although this information is not required under the California Environmental Quality Act, it may be required under the National Environmental Policy Act, and since the document has embarked on a discussion of costs, the effort should be finished in a complete, accurate and thorough manner.

6 Similarly, it would be advisable to include an analysis of potential income to the City under the various alternatives. Specifically, each of the alternatives liberates different quantities of ground area for different uses, and it is reasonably possible to estimate tax income which would flow to the City or City entities. Again, while such an effort is not required under CEQA, it may be required under NEPA, and since a financial discussion is included, this material is germane.

Thank you very much for the opportunity to present these comments.

Sincerely,

SHUTE, MIHALY & WEINBERGER

MARC B. MIHALY
Attorneys for the Mayor's
Embarcadero Committee

MBM:sm

Attachments A and B

ATTACHMENT A

TABLE VIII-1: Rank Order

Goal Area	Alts:	#1	#2	#3	#4	#4A	#5	#5A	#6
Transportation		3rd	2nd	4th	3rd	2nd	2nd	2nd	1st
Urban Design/Land Use		6th	5th	3rd	2nd	1st	7th	4th	8th
Environment		3rd	3rd	2nd	1st	1st	4th	4th	5th
Cost Effective		2nd	1st	4th	2nd	1st	3rd	3rd	3rd
Financially Feasible		2nd	1st	3rd	3rd	3rd	4th	4th	4th
Social Equity		3rd	2nd	1st	1st	1st	2nd	1st	2nd
Economic & Planning Factors		3rd	3rd	2nd	2nd	2nd	1st	1st	2nd
RANK ORDER SCORES (lowest score = highest place)		22	17	19	14	11	23	19	25

Alternative #4A ranks first. In addition, section VIII, page 37, states that Alternative 4A ranks first in terms of goods movement as well.

Source: I-280 Draft Environmental Impact Report

Submitted as part of Testimony of Jon Twitchell, Embarcadero Citizens Committee.

VEHICLES
GRAND SUMMARY
COMPARISON OF CORDON COUNTS (1947-1983)

	Vehicles 1947 Count Entering & Leaving 10 AM - 6 PM				Vehicles 1959 Count Entering & Leaving 10 AM - 6 PM				Vehicles 1965 Count Entering & Leaving 10 AM - 6 PM				Vehicles 1983 Count Entering & Leaving 10 AM - 6 PM			
	Number Enter	Per Cent	Number Leave	Per Cent	Number Enter	Per Cent	Number Leave	Per Cent	Number Enter	Per Cent	Number Leave	Per Cent	Number Enter	Per Cent	Number Leave	Per Cent
Pass. Auto	103,745	71.8	119,825	74.0	170,367	85.8	191,881	87.0	213,473	90.1	236,559	91.0	206,031	91.6	233,477	92.1
Taxi Cabs	6,182	04.3	6,272	03.9	5,509	02.7	5,310	02.4	5,728	02.4	5,683	02.2	6,541	02.9	6,602	02.6
Trucks	30,593	21.2	31,401	19.6	18,888	09.5	18,727	08.5	13,189	05.6	13,158	05.0	7,782	03.4	8,520	03.4
Local Trans.	3,624	02.5	3,588	02.2	3,263	01.6	3,450	01.6	3,104	01.3	3,274	01.2	2,721	01.2	2,794	01.1
Other Transit	310	00.2	416	00.3	844	00.4	1,060	00.5	1,346	00.6	1,530	00.6	1,951	00.9	2,078	00.8
TOTAL	144,454	100.0	161,502	100.0	198,871	100.0	220,428	100.0	236,840	100.0	260,204	100.0	225,026	100.0	253,471	100.0
	4:30 PM - 5:30 PM				4:30 PM - 5:30 PM				4:30 PM - 5:30 PM				4:30 PM - 5:30 PM			
	Number Enter	Per Cent	Number Leave	Per Cent	Number Enter	Per Cent	Number Leave	Per Cent	Number Enter	Per Cent	Number Leave	Per Cent	Number Enter	Per Cent	Number Leave	Per Cent
Pass. Auto	18,167	79.5	30,721	85.6	27,193	89.4	43,716	92.3	32,350	92.0	47,584	93.8	30,137	92.7	44,728	94.6
Taxi Cabs	882	03.9	1,028	02.8	772	02.6	778	01.7	775	02.2	845	01.6	852	02.6	854	01.8
Trucks	3,103	13.5	3,415	09.5	1,768	05.8	1,943	04.1	1,261	03.6	1,249	02.5	554	01.7	657	01.4
Local Trans.	657	02.9	623	01.7	489	01.6	614	01.3	482	01.3	594	01.2	445	01.4	492	01.0
Other Transit	45	00.2	128	00.4	170	00.6	304	00.6	341	00.9	453	00.9	506	01.6	547	01.2
TOTAL	22,854	100.0	35,915	100.0	30,392	100.0	47,355	100.0	35,209	100.0	50,725	100.0	32,494	100.0	47,278	100.0
	7:00 AM - 7:00 PM				7:00 AM - 7:00 PM				Expanded 7:00 AM - 7:00 PM				7:00 AM - 7:00 PM			
	Number Enter		Number Leave		Number Enter		Number Leave		Number Enter		Number Leave		Number Enter		Number Leave	
Total Veh.	228,745		220,940		316,000		304,846		376,400		359,846		363,211		350,981	

SOURCE: JHK & ASSOCIATES, San Francisco Metropolitan Traffic District Cordon Count, Volume 1, Executive Summary, July 1983, Page 3-29.

RESPONSE TO COMMENT LETTER G-12

G-12.1: Attachment A to the comment letter is a clear summation of the Committee's evaluation of the alternatives. The Committee's ranking of the alternatives in each goal area is consistent with the I-280 study team's assessment summarized in Table I-1 (page I-17) of the DEIR. The differences between Attachment A and Table I-1 are: The Committee used numerical scores in ranking the alternatives, while the I-280 study team used symbols to indicate the degree of attractiveness of each alternative relative to the baseline alternative (Alternative I); the Committee provided an overall rank for each alternative based on unweighted total score, while the I-280 study team did not do so.

During the course of the I-280 study, extensive efforts and care have been given to selecting the most appropriate alternatives evaluation mechanism. The underlying consideration was that the approach must be as objective as possible and recognize that evaluators do not weight the goals all the same. The scoring system as used by the Committee, was considered but was not adopted for two reasons: (1) numerical scores do not always adequately measure the differences among the alternatives, and (2) ranking by total scores inevitably reflect the value judgment of the evaluator and may lead to different conclusions by different evaluators. Because of these concerns, an overall ranking of the alternatives was not provided in Table I-1. Instead, the major findings about each alternative and their relative differences were presented in Table I-2 (pages I-18 through I-24) so that decision makers and members of the public can make their own judgments based on the information provided. Attachment A provides one such judgment of the Mayor's Embarcadero Citizens Committee.

As mentioned earlier, the Committee's ranking of the alternatives in each individual goal area is entirely consistent with the I-280 study team's findings. However, the conclusions are the Committee's own; other evaluators attaching different weights to each goal may conclude otherwise. The information provided by the Committee is included in this Summary of Comments and Responses report which is a part of the Final EIR.

G-12.2: The DEIR provides a system-level assessment of various treatments of eight elements for each of eight alternatives. These alternatives form the basis of the concept program, a program of transit and highway improvements in the I-280/Embarcadero corridor. Owing to the general nature of both key elements of the TCP and relevant implementation measures embodied in the City and County of San Francisco Downtown Plan, an attempt to indicate consistency between TCP elements and Downtown Plan implementation measures is necessarily general in nature.

Four key elements of the TCP were reviewed as to their consistency with the Downtown Plan. They are:

- o I-280 Touchdown;
- o Embarcadero Freeway;
- o Embarcadero Surface Road;
- o Muni Metro/PCS Extension.

The Downtown Plan calls for the removal of the I-280 stub end "as far back" as 6th Street, and connection with the Embarcadero Roadway. Only Alternatives IV and IV-A include elements which would be consistent with the Downtown Plan.

The Downtown Plan states that the Embarcadero Freeway "should be" removed between Howard and Broadway and replaced by on- and off-ramps connecting to the Embarcadero roadway near Howard and Folsom.

No alternative is totally consistent with the Downtown Plan, although Alternatives IV-A, V, and V-A would include elements that would remove the freeway from Beale to Broadway, and add on- and off-ramps near Howard and Folsom Streets. In addition, Alternative IV would include freeway removal from Beale to Broadway, but add only an exit ramp near Folsom and Spear Streets.

The Downtown Plan states that the Embarcadero roadway should be reconstructed with two lanes in each direction, an exclusive transit right-of-way, bicycle lanes, and separated access and loading areas at piers in maritime

use. Alternatives IV, IV-A, V and V-A provide four to six lanes of traffic as appropriate. Alternatives II, III and VI provide for four lanes throughout the length of the roadway. Alternatives III, IV, IV-A, V, VA and VI provide an exclusive right-of-way for E-Line in the roadway median, while Alternatives I and II do not. No alternative provides bicycle lanes within the roadway width, but off-roadway spaces are provided in all alternatives for bicycle path and access to piers.

Alternatives V, V-A and VI incorporate PCS extension to a downtown location (the Rincon Annex or the Transbay Terminal site), while the Downtown Plan calls for the City to "evaluate possible extension" of PCS trains to a terminal closer to downtown. Further, Alternatives III, IV, IV-A, V, and V-A include elements which incorporate Muni Metro extension from Embarcadero Station to the existing SP Depot, which would be generally consistent with the Downtown Plan.

As can be summarized from the reviews of the relevant transportation provisions of the Downtown Plan and key elements of the I-280 TCP above, no one alternative is totally consistent with the Downtown Plan. Alternatives IV-A, V, and V-A are more consistent with the Plan than other alternatives, while Alternative IV-A appears most consistent with the relevant transportation provisions of the Downtown Plan. Again, however, the general nature of implementation measures in the Downtown Plan, and the conceptual level of the TCP make it difficult to identify consistencies between the Plan and the Program.

G-12.3: Figures V-2 through V-9 in the DEIR show respectively the projected year 2000 p.m. peak period traffic and queuing in the study area under each alternative. The projected queuing on the Embarcadero Freeway or the remaining portion of the freeway was emphasized on these maps by a different symbol and distinguished from the queuing on surface streets. They were not in error. The amount of queueing which occurs on the freeway must be accounted for separately from surface street queueing. Freeway queueing moves at a greater rate of speed than surface street queueing allowing more vehicles to be processed in a given time. For this reason freeway queueing cannot be

directly added into the block-hours of queueing shown in Table V-9 for Alternatives I, II, V and VI. It is true that portions of the projected queuing on surface streets under the freeway removal alternatives are those transferred from the Embarcadero Freeway. This is evident by comparing the queuing maps for alternatives with and without the the freeway removal. In fact, one of the purposes of these maps was to illustrate the impact of freeway removal on surface street traffic and queuing in the study area.

G-12.4: The travel demand forecasting methodology adopted for the I-280 study was described on page IV-68 of the DEIR and in detail in Working Paper 1.5.6, Travel Demand Forecasting/Analysis. It was not a trend projection based on historical surface traffic data. Rather, it projects the increase in person trips based the projected growth in the study area and converts person trips into transit and vehicle trips based on current modal split patters in San Francisco.

The results from the 1983 Traffic Cordon Count do not necessarily imply an apparent contradiction with the I-280 study projections. First, although the cordon count indicates a slight decrease in surface street traffic since 1965, it indicates an increase in total person trips and in transit trips (see 1983 San Francisco Cordon Count, Volume 1, Executive Summary, page 3-3). This observed increase in total person trips and transit trips is consistent with the I-280 study projections. Secondly, there are no indications that the decline in surface street traffic will continue through year 2000. It should be noted that during the period between 1965 and 1983 the City had a tremendous increase in transit capacity with the addition of BART and Muni Metro, which undoubtedly contributed to the slight decline in surface street traffic. No transit improvements of such magnitude is projected between now and year 2000. The projected growth in the study area and the amount of transit improvements proposed in the alternatives do not suggest a continuing decline in surface street traffic. A projection using the conditions of the Cordon Count will not provide a reasonable prediction of the surface street traffic in year 2000.

G-12.5: A new table, Table V-5a, is added to the DEIR, following page V-34. Table V-5a shows the annual funding requirements and shortfall for each alternative

excluding the PCS extension. This has a significant effect on the overall funding required for Alternatives V, V-A and VI, and reduces the balance remaining after Transfer Concept Funds are applied to 28% (V-A) to 43% (V) of the amounts needed with the PCS element. Please see Table V-5a on the following page of this Addendum.

Specific sources of funds for all the alternatives are discussed in detail in Technical Working Paper 2.2.12, which is a background document for the DEIR. The working paper indicates the percentage of available funds from each source that would be required to finance the transit and highway-related elements in each alternative. This provides a measure of the financial feasibility of the alternatives. More detailed analysis may be necessary when a specific alternative has been selected.

G-12.6: The DEIR indicates the amounts of land both taken and liberated to create the appropriate right-of-way for each element. In the case of land taken, the DEIR estimates the tax loss to the City and County of San Francisco. However, new taxes from liberated land will depend upon the market value of the land and the specific type and intensity of development located on each parcel. No development proposals have been advanced in sufficient detail to determine any potential public revenues. Hence, any estimate of such revenues would be speculative at this time.

TABLE V-5a (Excluding PCS Extension)
I-280 TRANSFER CONCEPT FUND SHORTFALL
(Dollars in Millions)

	83/84	84/85	85/86	86/87	87/88	88/89	89/90	Totals
Alternative II								
Capital Expenditures[1]	$ 1.45	$ 3.76	$ 17.08	$ 26.94	$ 32.59	$ 22.71	$ .21	$104.73
Transfer Concept Fund[2,4]	$ 1.45	$ 3.76	$ 17.08	$ 26.94	$ 32.59	$ 22.66	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ .00	$ .00	$ .05	$ .21	$ .26
Alternative III								
Capital Expenditures	$ 3.01	$ 7.78	$ 37.16	$ 62.60	$ 64.20	$ 66.20	$ 8.01	$248.95
Transfer Concept Fund[4]	$ 3.01	$ 7.78	$ 37.16	$ 56.53	$ .00	$ .00	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ 6.07	$ 64.20	$ 66.20	$ 8.01	$144.48
Alternative IV								
Capital Expenditures	$ 2.76	$ 7.15	$ 48.23	$ 77.10	$ 84.06	$ 67.55	$ 7.62	$294.47
Transfer Concept Fund[4]	$ 2.76	$ 7.15	$ 48.23	$ 46.33	$ .00	$ .00	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ 30.77	$ 84.06	$ 67.55	$ 7.62	$190.00
Alternative IVA								
Capital Expenditures	$ 2.78	$ 7.21	$ 48.05	$ 77.54	$ 83.64	$ 66.50	$ 8.09	$293.81
Transfer Concept Fund[4]	$ 2.78	$ 7.21	$ 48.05	$ 46.43	$ .00	$ .00	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ 31.11	$ 83.64	$ 66.50	$ 8.09	$189.34
Alternative V								
Capital Expenditures	$ 3.46	$ 8.99	$ 42.50	$ 68.51	$ 71.70	$ 77.16	$15.44	$287.76
Transfer Concept Fund[4]	$ 3.46	$ 8.99	$ 42.50	$ 49.52	$ .00	$ .00	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ 18.99	$ 71.70	$ 77.16	$15.44	$183.29
Alternative VA								
Capital Expenditures	$ 3.47	$ 8.93	$ 42.50	$ 67.44	$ 69.59	$ 47.12	$14.77	$253.83
Transfer Concept Fund[4]	$ 3.47	$ 8.93	$ 42.50	$ 49.56	$ .00	$ .00	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ 17.88	$ 69.59	$ 47.12	$14.77	$149.36
Alternative VI								
Capital Expenditures	$ 2.62	$ 6.78	$ 53.64	$ 49.21	$ 58.34	$ 31.38	$ 7.17	$209.16
Transfer Concept Fund[4]	$ 2.62	$ 6.78	$ 53.64	$ 41.42	$ .00	$ .00	$ .00	$104.47
Balance	$ .00	$ .00	$ 18.56	$ 7.79	$ 58.34	$ 31.38	$ 7.17	$104.68

[1] Capital expenditures inflated 8% per year.

[2] Based on total amount of $104.470 including local 15% match.

[3] Assumes both Embarcadero Freeway removal and pullback of I-280 would be eligible for Transfer Concept funding and no federal payback would be required. In either case, the totals in this table would not be affected since the cost of these elements is well below the balances for the appropriate alternatives.

[4] Assumed available in each year for the purpose of funding analysis, actual funds available may vary with Congressional apportionment for each year.

November 27, 1984

Mr. William Chastain
Caltrans
P.O. Box 8310
San Francisco, CA 94120
150 Oak Street, Room 348
San Francisco, CA

Dear Mr. Chastain:

Per your request for commentary on the I-280 Transfer Concept Program Draft EIR, the Committee to save Aquatic Park* has instructed that the following comments be forwarded. These comments deal with the Jefferson Street and Aquatic Park portion of the E-Line.

1. The Draft EIR points out the visual impact of overhead electric lines and related poles along Aquatic Park but does not review benefits, mitigation or alternatives. 1

2. The Draft EIR points out the physical danger of running a train down a pedestrian path but is sketchy about the environmental impact, benefits or alternatives. Signs, surface textures and speed limits can not be considered as mitigation of the physical hazard of running electric vehicles at 7-1/2 minute intervals along Jefferson Street and Aquatic Park. Sooner or later someone is going to get run over (San Francisco State is a sad example). The inevitable barrier will have to be erected. The impact of a barrier on Jefferson Street does not appear to have been addressed. The impact of a barrier down Aquatic Park Prominade does not appear to have been addressed. 2

3. The Draft EIR states that between 180 and 320 public parking spaces will be eliminated by the proposed E-Line if it is run down Jefferson Street but the Draft EIR does not appear to address the subject of what will happen to the people who use those parking spaces or what possible mitigation is available. 3

4. The Draft EIR does not appear to review the impact of removal of vehicular traffic from the area (or at least your office and ourselves could not find where this subject was addressed)**. 4

5. The Draft EIR quotes the GGNRA as finding that the proposed E-Line concept will have no adverse impact, however, there is no explanation of how or why the GGNRA came to this conclusion. 5

We have been asked to have the following question raised for review in the EIR:

"Is it worth disruption on Jefferson Street and Aquatic Park so that tourists can ride to Fort Mason in an electric vehicle (elephant train at the Zoo?) rather than walk along one of the most spectacular bayside paths in San Francisco?" 6

We appreciate that,as explained, the Draft EIR is a broad brush approach to a large issue. However, it is felt that the Jefferson Street and Aquatic Park portions of the EIR deserve attention before they can be included in the final draft of a document as important as the I-280 Environmental Impact Report.

Thank you for this opportunity to contribute.

Very truly yours,

Richard A. Frenzel
Chair, Committee to Save Aquatic Park

* Committee to Save Aquatic Park is a Joint Committee of Boards of Directors of the Dolphin and South End Rowing Clubs. The purpose of the committee is to monitor and report to the boards on activities effecting the environs of the clubs. Joint membership of the clubs is some 1,500.

** For example, some 12 million dollars is being spent on a breakwater to encourage the fishing industry and at the same time it is proposed to barricade that industry with a predestrian mall. There may be a solution, but the problem warrants being dealt with.

RESPONSE TO COMMENT LETTER G-13

G-13.1: In developed urban areas, overhead electric lines are commonly attached to the sides of buildings for support in lieu of poles. However, poles would be required in Aquatic park because of the existing open space. An electrified rail system through the park would be an alternative to the use of overhead electric lines, but has the disadvantage of requiring a right-of-way that excludes pedestrian access. In this case, protected crossings would need to be constructed at selected locations, and would have to be either overhead or underground crossings and would restrict pedestrian movement in the park. Diesel buses could be an alternative to the use of electric vehicles that require overhead electric lines, but noise, odors and safety problems may deem this alternative unacceptable. Pedestrian safety in Aquatic Park is discussed on page VI-28 of the DEIR.

G-13.2: Please see Response to Comment G-13.1 for alternatives, mitigations and impacts of a protected E-line right-of-way through the Aquatic Park. A barrier on Jefferson Street for E-Line was not identified in the DEIR as a specific mitigation measure. However, it could be considered during project design and its impacts addressed during the project-level environmental clearance for E-Line. It should be noted that the barrier at the SFSU and 19th Avenue site is to prevent pedestrians from crossing a state highway where transit operates at high speed, whereas in Aquatic Park transit would operate at 5 miles per hour.

G-13.3: Mitigations to loss of parking on Jefferson Street would include replacement parking off-street, mixed transit and vehicle use of curb spaces during off-peak hours, and selection of an alternative which does not require removal of parking. Specific project level mitigations will be developed as part of project design for selected projects.

G-13.4: The alternatives propose only redirection of through traffic in the Fisherman's Wharf area to improve access and circulation and to mitigate the impact of proposed transit improvements. Local access to businesses in the area have been maintained in all alternatives.

G-13.5: An objective of the GGNRA General Management Plan is improved transit access to and within the GGNRA parks. The proposed E-Line would further this objective. (Please see Comment F-2 from GGNRA). The DEIR notes that the impacts of running the E-Line through the parks would primarily involve visual and safety impacts. It is also noted that the possible use of historic vehicles would be particularly appropriate given the recreational and historic nature of this area.

As noted on page VI-28, an environmental assessment of the Golden Gate National Recreation Area, Golden Gate/Point Reyes General Management Plan, found the concept of E-Line service through Aquatic Park to have no significant adverse environmental impacts. Additional information on the objectives of the Management Plan can be found on page VI-19.

G-13.6: The merits of the Muni E-Line are discussed under the descriptions of the various alternatives, Section III-B. The E-Line represents an element of the overall I-280 Transfer Concept Program, which is to provide transportation improvements and enhance the character of the San Francisco northeastern waterfront area (page II-9). Methods to improve pedestrian safety are noted on page VI-28. Paragraph two implies that the existing walkway through Aquatic Park would be retained for pedestrian use.

CHINATOWN TRIP
華埠交通改善會

November 28, 1984

Policy Control Committee
I-280 Transfer Concept Program
c/o Caltrans
P.O. Box 7310
San Francisco, CA 94120

Gentlemen:

Subject: Draft Environmental Impact Report
I-280 Transfer Concept Program
San Francisco, California

The Chinatown Transportation Research and Improvement Project (TRIP) has reviewed the subject report and has the following comments for the record:

1. The report lacks sufficient data on the environmental impacts of the proposed alternatives on Chinatown.

There does not appear to be any discussion of the potential impacts of the various alternatives on Chinatown. The only mention of the potential impacts is on Page VIII-28. This section on Equity Considerations simply states that the removal of the Embarcadero Freeway would cause increased time delays and reduced speeds for motorists from Chinatown and other CBD points. We would like some quantitative estimate of the amount of delay, periods of delay, and a specific identification of streets where these delays would occur.

1

2. The report does not address financial feasibility in sufficient detail.

The report estimates the total costs for all but Alternatives I and II to be far greater than the funds available. It would seem fruitless to consider Alternatives III through VI unless there is a reasonable expectation that funding can be found to implement these proposals.

2

We hope that the Final Environmental Impact Report will devote more detail and analysis to the concerns that we have raised.

Sincerely,

LeLandy Dong
Co-Chairperson

cc: San Francisco Planning Commission
Metropolitan Transportation Commission

TRANSPORTATION RESEARCH AND IMPROVEMENT PROJECT
615 GRANT AVE. 2/F SAN FRANCISCO, CALIFORNIA 94108 (415) 391-4133

RESPONSE TO COMMENT LETTER G-14

G-14.1: The impacts of the alternatives on Chinatown were discussed in Sec. V.C.2, Traffic and Parking, at the same level of detail as for other major activity centers in the study area. Traffic delays and queueing on surface streets in Chinatown were indicated on Figures V-2 through V-9 under each alternative. More detailed information on transportation impacts in Chinatown can be found in Working Paper 2.2.2, Transportation Performance Measures. In addition, in response to an earlier comment by TRIP, the impacts of Alternatives I, II, III, IV, V and VI on Chinatown were specifically addressed and additional analysis reported in a written response to that comment. A copy of the earlier response is attached as part of the Response to Comment G-14.1.

G-14.2: Potential sources of funds other than the Interstate Transfer funds are discussed in the DEIR and estimates have been made of the required level of these other funding sources in Technical Working Paper 2.2.12, which is a background document to the DEIR. The analysis indicates that funding sources do exist, but the feasibility of obtaining an adequate level of funds cannot be assessed at this time. Certainly, this will be a major consideration in selecting a preferred alternative. A commitment to pursuing the preferred projects is the first step in securing the necessary funding for these projects.

DKS associates
Traffic • Transportation • Engineering

Principals:
Charles E. De Leuw, Jr., P.E.
William H. Dietrich, P.E.
Larry R. Grove, P.E.
Michael A. Kennedy, P.E.
Hans W. Korve, P.E.
Richard T. Sauve, P.E.
Daniel T. Smith, Jr., P.E.

June 2, 1983

Mr. Walter Kudlick
Parsons Brinkerhoff Quade & Douglas
1625 Van Ness Avenue
San Francisco, California 94109

Subject: I-280 Transfer Concept Program Study
Chinatown Issues

P82098-3

Dear Walter:

Following our meeting with Michael Louie and Enid Lim it was decided that some further analysis of traffic conditions in Chinatown would be included as part of the rewrite of Working Paper 2.2.2. Work performed as part of the transportation services measures for each alternative did analyze traffic impacts around the Chinatown. However, there was no specific mention and discussion of Chinatown access related concerns as was done for Fisherman's Wharf. This letter summarizes some of the key impacts of the I-280 study alternatives on Chinatown which have already been analyzed and provides a study of intersection operation at Broadway and Stockton.

ACCESS

The most significant study alternatives element which potentially affects Chinatown is the removal of the Embarcadero Freeway. Removal of the Broadway and Clay/Washington ramps would directly affect access to and from Chinatown and change traffic volumes passing through this area. Other transit and I-280 ramp options would impact Chinatown access only to a limited degrees (for example, MUNI-Metro Extension or I-280 pulled back ramps).

The main access streets to Chinatown for traffic which uses the Embarcadero Freeway are Broadway, Clay Street and Washington Street. Without the freeway, the access routes would include Broadway via The Embarcadero; Clay Street via Montgomery, Battery, Beale and The Embarcadero; Washington Street via Kearny, Drumm/Main and The Embarcadero; and Stockton Street. Therefore, there appear to be many available alternative routes. Traffic would spread out between these different paths compared to being concentrated on the Embarcadero Freeway.

Alternatives I, II and VI maintain the existing Embarcadero Freeway ramps and would not change present access patterns. Alternatives III, IV and V would remove the Embarcadero Freeway and would provide varying combinations of new ramps shown below:

	ALTERNATIVE		
	III	IV	V
New Folsom/Spear Off-Ramp	No	Yes	Yes
New Howard/Embarcadero On-Ramp	No	No	Yes

Freeway access for Chinatown would be substantially changed under Alternatives III and IV where limited replacement freeway access would be provided. Routes to the freeway from Chinatown would become north/south instead of the existing east/west. For example, without the Embarcadero Freeway during the evening peak hour, over 50 percent of Chinatown trips would divert to Stockton Street. However, in Alternative V where both new on- and off-ramps replace the removed Embarcadero Freeway, the flow of traffic to and from Chinatown would be similar to traffic flow with the freeway. Much of the Chinatown traffic presently using the Embarcadero Freeway would maintain its east/west access pattern using the reconstructed Embarcadero Roadway, tieing in directly to the new ramps at Folsom/Spear and Howard/Embarcadero while continuing on to the new I-280 ramps further south. Less than 30 percent of the projected Chinatown Embarcadero Freeway users would divert to the west of Stockton Street under Alternative V.

CAPACITY ANALYSIS

As shown in Working Paper 2.2.2, surface street congestion becomes quite severe during Year 2000 evening peak hour with removal of the Embardacero Freeway. Surface street access from areas north of Market Street to the freeway system would be changed from an east/west movement to a north/south movement. All corridors crossing Market Street between Stockton Street and The Embarcadero would experience queueing and delays with levels of service primarily in the "E" and "F" range. Since many of the Chinatown surface streets presently (1983) experience level of service "E" and "F" conditions during evening peak periods, the I-280 alternatives would have little additional effect on individual intersection levels of service. However, without the Embarcadero Freeway traffic attempting to pass through or around Chinatown would increase causing additional delay for traffic accessing Chinatown.

To provide a further indicator of Chinatown street capacity under freeway alternatives, capacity of the Broadway/Stockton intersection was analyzed. Although level of service at the Stockton Street/Broadway intersection improves without the freeway due to reduced Broadway volumes (see Table 1), the use of Stockton Street increases. Traffic increases on Stockton Street due to the Embarcadero Freeway removal consist of four components:

- Traffic from the area north of Broadway continuing through the Stockton Tunnel;
- Traffic from the Broadway Tunnel turning right onto Stockton;
- Traffic from the CBD diverting to the west to use Stockton which crosses Market Street; and
- Chinatown traffic diverting west, using Stockton.

For Alternatives III and IV (without a new on-ramp) the increase in Stockton Street Tunnel traffic (compared to Alternatives I, II and VI) with freeway would be approximately 220 vehicles per hour (VPH) during the evening peak hour.* The major components of this increase would be traffic from the CBD using Stockton for freeway access (75 VPH) and Broadway Tunnel traffic (70 VPH). The traffic increase on Stockton near Broadway would be 20 to 25 percent leading to delays of 2 to 3 minutes. Alternative V would increase Stockton Tunnel traffic by approximately 85 VPH during the evening peak hour, significantly less than projected in Alternatives III and IV. Much less CBD traffic would filter westward (15 VPH) reducing pressures on internal circulation within Chinatown. Additional delays, compared to Alternatives I, II and VI would be approximately one minute. It should be noted that additional traffic volumes on Stockton Street would also reduce transit operating efficiency.

CONCLUSION

The main I-280 Traffic Concept Program study element which affects Chinatown is the removal of the Embarcadero Freeway. Traffic diversion due to freeway removal would not greatly change intersection levels of service within Chinatown, but would increase delays primarily along Stockton Street which would become a key path to the freeway system. Broadway and Clay Streets would experience overall traffic volume reductions in the evening peak due to freeway ramp removal. However, travel time savings from volume reduction would be much less than delays due to extensive queueing approaching freeway on-ramps. Generally, traffic conditions would become increasingly more restricted in Chinatown under Alternatives III and IV, less so with Alternative V and even less with Alternatives I, II and VI. Chinatown traffic conditions and access with Alternative V (with ramps) would not be greatly different than Alternatives I, II and VI (freeway up) since the major access routes would be established in an east/west direction.

Sincerely,

DKS ASSOCIATES

Richard T. Sauve
Principal

RTS:ceh
Attachment: Table I

---

* Year 2000 analysis.

Table I
BROADWAY/STOCKTON INTERSECTION PERFORMANCE
Alternative Analysis

	Level of Service	Volume to Capacity Ratio
Existing (1982)	D	0.80
Alternative I*	D	0.88
Alternative II**	D	0.88
Alternative III*	D	0.80
Alternative IV*	C	0.75
Alternative V*	C	0.77
Alternative VI*	D	0.88

---

* Year 2000 Traffic.

Hanford · Freund & Co.

47 Kearny Street · San Francisco · California 94108

Telephone (415) 981-5780

November 28, 1984

Mr. William Chastain
Caltrans
P.O. Box 7310
San Francisco, California 94120

Re: I-280 Transfer Concept Program
I-280 Touch-Down Ramps

Dear Mr. Chastain:

As Agents for China Basin Properties, Ltd., owners of the China Basin Building, 185 Berry Street, we would like to comment on the recently released draft environmental impact report for the I-280 Transfer Program.

In reviewing the eight alternatives with a view toward their impact on the China Basin area, we feel the I-280 touch-down ramp design option in Alternative III is the most logical, cost effective and least disruptive of the possibilities set forth.

1 This option would conclude the logic of 3rd and 4th Streets as the San Francisco origins of I-280. Both 3rd and 4th are now major arterials connecting the Downtown, South of Market and beyond. No significant rerouting of existing surface traffic would be necessary and the connection of the Embarcadero to I-280 via King Street would keep the South Beach area free of the unacceptable urban design problems found in the 2nd Street touch-down alternative. The 2nd Street touch-down option would bring the same problems to this area that are now a major source of controversy in the Beale to Broadway elevated freeway area.

It would also appear that the Alternative III design option would be the most cost effective.

An extension of I-280 to 2nd Street would result in a contorted traffic flow pattern with the New South Beach Marina/Park area and the changing of the Embarcadero roadway to run along King Street.

Finally, the Alternative III design option would minimize disruption to the area during the demolition/construction phase. All the work would be over vacant land making the noise, dirt, debris, etc. problems of construction much easier and cheaper to handle and requiring only the relocation of parked cars.

Given the existing traffice patterns, urban design considerations and costs involved we highly favor Design Alternative III for the I-280 Touch-Down ramps. We feel this option best addresses the concerns of both local and regional I-280 commuters.

Thank you for your consideration; and if you have any questions, please feel free to contact us.

Very truly yours,

HANFORD/FREUND & CO.

Fredric S. Freund
President

FSF:gjm

cc: Mr. Peter Davison, Manager
China Basin Building

cc: Mr. Dean Macris, Director
San Francisco City Planning Department

RESPONSE TO COMMENT LETTER G-15

G-15.1: The Commentator's analysis and reasoning in support of the I-280 touch-down ramp design option in Alternative III, is noted. The comment letter is included in this Summary of Comments and Responses report, which is a part of the Final EIR.

Church Street Merchants Association
211 Church Street, Suite B
San Francisco, CA 94114

November 29, 1984

William Chastain
Caltrans
P. O. Box 7310
San Francisco, CA 94120

Dear Mr. Chastain:

1 The Church Street Merchants Association in cooperation with Muni, the San Francisco Chamber of Commerce, the Eureka Valley Merchants Association, the Eureka Valley Promotion Association, the Merchants of Upper Market and the Golden Gate Business Association have participated in establishing the San Francisco Historic Trolley Festival. We strongly support the proposed E and F lines.

2 The most viable concept would be to run streetcars from Castro and 17th Streets down 17th Street, Church Street, Market Street (including installing tracks on Market between Church Street and Duboce) to the Ferry Building. The streetcars should continue along the Embarcadero to Fort Mason. This would connect the neighborhoods of Upper Market, Mission Dolores, 4 of the 5 cable car turnarounds, the Ferry Building, Pier 39, Fishermans Wharf, and Ghiradelli Square by one route.

3 We feel that this would enhance the visitor experience and mobility for the many tourist attractions along the route. In addition, the neighborhoods of Upper Market would benefit by restoring the character established when numerous streetcar and cable car lines crisscrossed the area.

4 The Church Street Merchants Association in cooperation with the San Francisco Friends of the Urban Forest have planted flowering plum trees along the F line route on Church Street from Market Street to 17th Street.

We would be interested in knowing what we can do to further this proposal.

Sincerely,

Michael Stevens

Michael Stevens
President

MS:rr

RESPONSE TO COMMENT LETTER G-16

G-16.1: It is acknowledged that the Church Street Merchants Association strongly supports the proposed E- and F-Lines.

G-16.2: The Association's proposed streetcar route along the Embarcadero to Fort Mason is consistent with the E-Line alignment proposed in the I-280 study alternatives. However, the F-Line route along Market Street is the subject of a separate study.

G-16.3: Comment noted. Please also see Response to Comment G-16.2.

G-16.4: Comment noted.

G-17

san francisco bicycle coalition
P.O. Box 22554 San Francisco 94122

29 November 1984

William Chastain
CalTrans
P.O. Box 7310
SAN FRANCISCO 94120

Dear Mr. Chastain:

Please include the following comments on the Draft EIR for the I-280 "Transfer Concept" in regards to reconstruction of the Embarcadero surface road in San Francisco.

1 The present Embarcadero surface roadway is unsafe for bicyclists. There is no provision in the right lanes in either direction for bicycles. CalTrans standards dictate a right lane width of 16 ft (12 ft for motor vehicles plus 4 ft for bicycles). Right lanes are generally 12 ft or less leaving no room for bicycles, which then have to take up a full traffic lane to avoid getting crammed into parked cars in the northbound direction, or onto railroad tracks in the southbound one.

2 Quite a bit of the Embarcadero roadway has already been reconstructed in recent years, but absolutely no consideration has been given to bicycles, which should definitely be provided for in this recreational area, both for recreational riding and for commute use. Any reconstruction under this proposed program must include adequate right traffic lanes.

3 There still seems to be an attitude prevalent among landscape architechts and others of their ilk that bicycles ought to be diverted onto some sort of bicycle paths on or near the sidewalk, or onto an adjacent street system away from the main traffic artery. One look at the Embarcadero and its neighboring streets will show why this idea is totally unworkable. Bicyclists, of course, will ignore any such plan and ride right in the street where they belong, albeit somewhat furtively, given the poor design of the roadway.

4 It is the responsibility of CalTrans to ensure that its standards, adopted after years of investigation by competent transportation engineers, are adhered to in any redesign of the Embarcadero surface roadway. The EIR must be amended to reflect this in emphatic terms, addressing specifically bicyclist use.

Very truly yours,

Charles Robbins Arnold

Charles Robbins Arnold
Executive Director

RESPONSE TO COMMENT LETTER G-17

G-17.1: Comment noted

G-17.2: Comment noted. One of the objectives for the Embarcadero Corridor is to increase recreational uses of the area by pedestrian and bicycles. The needs of bicyclists have been reflected in the concept designs for the reconstruction of the Embarcadero surface roadway.

G-17.3: Comment noted. There are different opinions on how to accommodate bicyclists in roadway design. The most appropriate design will vary with location and local traffic conditions, and must be determined on a case-by-case basis. Although the I-280 TCP alternatives provide for increased bicyclist use of the waterfront corridor, the exact configurations have yet to be developed during detailed design of the Embarcadero surface roadway. The Commentator's opinions, as well as Caltrans and City standards, will be considered and incorporated into the detailed design of this roadway, should it be selected for implementation.

G-17.4: Please see Response to Comment G-17.2 and G-17.3.

November 30, 1984

Mr. William Chastain
I-280 Transfer Concept Program
CalTrans
P.O. Box 7310
San Francisco, CA 94120

Dear Mr. Chastain:

The Bay Area Council welcomes the opportunity to comment on the I-280 Transfer Concept Project Draft Environmental Impact Report (DEIR). We are not yet prepared to take positions on specific projects, but we do have some concerns regarding the adequacy of the DEIR.

Our comments are limited to the transportation impacts of removing the Embarcadero Freeway. Our key concerns are:

1. The analysis of the transportation impacts is inadequate. The DEIR does not clearly identify or analyze either the overall transportation impacts or the disproportionate impacts of various projects. Table I-2 points out that removal of the Embarcadero Freeway will result in significantly degraded traffic conditions for automobile or surface transit users. It also points out that alternatives which remove the Embarcadero Freeway do not result in substantial improvements over the "Do Nothing" alternative. These issues, however, are not clearly discussed. 1

Secondly, the analysis seems to be weighted heavily in favor of urban design factors; only two of the seven alternatives even consider retaining the Embarcadero Freeway. The discussion of environmental impacts, therefore, focuses on the benefits of removing the freeway in lieu of the adverse transportation impacts which may occur by virtue of removal.

The Bay Area Council established in 1945, is a business-sponsored organization involved in policy analysis and advocacy on region-wide issues such as economic development, housing, transportation, infrastructure, land use, environmental quality and job training.

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THE BAY AREA COUNCIL INC. 348 WORLD TRADE CENTER SAN FRANCISCO 94111 (415) 981-6405

2

2. The examination of mitigation measures is inadequate. The DEIR mentions several "unavoidable adverse impacts" associated with the removal of the Embarcadero Freeway. However, only modified on and off ramps, as in Alternative IV-A, have been included to mitigate these impacts. While this alternative significantly improves traffic conditions relative to other alternatives which remove the freeway, it falls short in relation to those alternatives in which the freeway is retained. Has it been determined that there are no mitigation measures sufficient to offset the adverse impacts?

3

3. The DEIR fails to consider any impacts on a regional scale. The transportation analysis is limited to only one segment of the commute trip. For example, the DEIR does not address the availability of or access to transit; it does not attempt to determine whether sufficient parking is available at outlying locations. The DEIR should clearly identify the regional implications of removing the Embarcadero Freeway to ensure that policy makers can make informed decisions.

While these are our key concerns, two additional issues are:

4

4. A detailed financial plan for the TCP will not be available until after selected projects are advanced for implementation. A viable funding plan should be considered within the context of the DEIR, consistent with the goal of "Financial Feasibility."

5

5. For purposes of analysis the DEIR should include the Muni Metro Embarcadero full turn-a-around loop as an existing project. This would revise the travel time ratings, offering a more realistic basis for comparison.

The importance of the choices to be made mandate that the DEIR be as thorough as possible. Thank you for considering our comments.

Sincerely,

Angelo J. Siracusa
President

AJS:ajw
cc: (see attached list)

cc: Hon. Dianne Feinstein
Dean Macris
Burch Bachtold
Valance Gill
Rudolf Nothenberg
Eugene Gartland
Jeff Lee
Wilbur Hamilton
Brigid Hynes-Cherin
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James Lockhart
Rick Laubscher
Douglas Wright
Reven A.F. Tranter
Dennis Fay
Alan Lubliner

RESPONSE TO COMMENT LETTER G-18

G-18.1: The various projects proposed in the alternatives are all elements of a total transportation system for the study corridor. They are all interrelated, and one element complements the functions or mitigates the impacts of the other elements. The impacts of an element will vary with the treatments given to the other elements in each alternative. Therefore, impacts were analyzed for "alternatives" rather than for "projects". The overall transportation impacts of each alternative were adequately analyzed and discussed in Sec.V.C of the DEIR (pages V-43 through V-80). Detailed supporting material can be found in Working Paper 2.2.2, Transportation Performance Measures. Table I-2 of the DEIR includes summary findings of the analysis. As indicated in Table I-2, the alternatives which include the Embarcadero Freeway removal will result in significant negative impacts on surface street traffic and surface transit users. They also have positive impacts in non-transportation areas to other affected groups. These issues were discussed in Sec. VIII, Evaluation of Alternatives, in particular, Sec. VIII.C, Equity Considerations, and Sec. VIII.E, Trade-off Analysis.

Each alternative describes an alternative concept of improvements in the study corridor, which includes both highway and transit elements. Embarcadero Freeway is one of the several elements. Although the Embarcadero Freeway removal was included in five of the eight alternatives, the proposed treatments for other elements are different in each of the five alternatives. Each of these five alternatives represents a unique improvement concept for the corridor. Also, the treatment for the Embarcadero Freeway removal is the same in three of the five alternatives (see Table G-1, page A-67).

G-18.2: The DEIR addresses impacts and mitigations at the "system" level. System-level mitigations were carefully examined and reflected in the proposed concept design for each alternative. In each alternative, the proposed treatment for an element acts as mitigations to the impacts of other elements. The proposed treatments for the on- and off-ramps, the Embarcadero surface roadway and E-Line all act as mitigations to the removal of the Embarcadero Freeway. Also, in many ways, one alternative acts as a mitigation to the impacts of another alternative. The alternatives which

preserve the Embarcadero Freeway act as a total mitigation to the transportation impacts of the alternatives which include the freeway removal.

G-18.3: The availability of and access to transit in the study corridor were addressed in the DEIR (Sec. V.C.). The impact of the Embarcadero Freeway removal on commuters from the East Bay and Peninsula areas were also discussed. Peak period transit and highway travel times for representative regional trips were included in Table E-1 (page A-43) and Table E-6 (page A-48). The impacts of each alternative on the regional freeway systems were discussed on Table V-10 (page V-64). It should be noted, however, the I-280 study does not address issues, policies or plans related to the regional transportation system; nor does it analyze in detail the full impacts of the alternatives on the regional transportation systems. The regional issues can only be adequately addressed by studies of a regional scale. The Peninsula Mass Transit Study mandated by SCR-74 is one such study. Becasue of the limitations of the I-280 study with respect to regional impacts, it was stated in the DEIR (see Notice following the title page) that no decision will be made with respect to any transit elements that involve the San Jose - San Francisco Transit Corridor pending completion of the SCR-74 study.

G-18.4: An analysis of financial feasibility is provided in Technical Working Paper 2.2.12, which is a background document for the DEIR. The working paper indicates the percentage of available funds from a variety of programs and sources that would be required to finance each alternative. The transit-related elements in all the alternatives could be funded from identified sources, provided adequate funds from each of the sources could be secured. In the highway-related elements, however, no funding sources could be identified for a portion of the costs ranging from $28.54 million (Alternative III) to $63.46 million (Alternative VA).

G-18.5: The Muni Metro turnaround loop was a "proposed" project at the time when the I-280 TCP alternatives were analyzed. The project was specifically included as part of the Muni Metro extension element so that its alterntaive designs (turnback vs. loop) and their respective impacts are investigated and results used in the detailed design for that project. Treating the turnaround loop

as an existing project would reduce the transit travel time savings benefit for Alternatives IV, IVA, V and VA, relative to Alternative I. However, its impact on Muni operations would be totally different as shown in the DEIR.

SAN FRANCISCO
CHAMBER OF COMMERCE

November 30, 1984

Mr. William Chastain
I-280 Transfer Concept Program
Caltrans
P.O. Box 7310
San Francisco, CA 94120

Dear Mr. Chastain:

The San Francisco Chamber of Commerce welcomes the opportunity to submit our comments for the I-280 Transfer Concept Program Draft Environmental Impact Report (DEIR).

After a thorough analysis of the DEIR, our Board of Directors' Executive Committee and Transportation Committee have expressed concern that the **Embarcadero Freeway removal will result in significant and unmitigated adverse impacts** to the Financial District, South of Market, Rincon Hill and South Beach, and Fisherman's Wharf areas. The DEIR findings indicate that the proposed mitigation measures cannot overcome the problems associated with street-level congestion due to the removal of the Embarcadero Freeway. The Chamber therefore requests your full and careful assessment of our comments.

Based upon our review of the DEIR, it is our understanding that "it is not the purpose of this EIR to recommend a preferred alternative" (DEIR pg. I-15). However, it is clear that at least one member of the Transfer Concept Program decision-making tripartite, the City, prefers Alternative IVA. Alternative IVA includes the following elements:

- o Removal of the Embarcadero Freeway and the addition of entry and exit ramps near Folsom and Spear Streets,
- o Pull back I-280 to 6th Street and connect with the street system,
- o Reconstruct the Embarcadero surface roadway from 4-to-6-lanes where appropriate,
- o Muni Metro from Embarcadero Station to the SP Depot with a turnaround loop,
- o Muni E-Line streetcar extension from Fort Mason to the SP Rail Line Depot, and

465 CALIFORNIA STREET, 9TH FLOOR
SAN FRANCISCO, CA 94104, (415) 392-4511

- o Transportation Systems Management (TSM) along the northeastern waterfront.

Accordingly, our comments focus upon the unmitigated adverse impacts which would occur from the implementation of this alternative as well as all Embarcadero Freeway takedown alternatives.

Chamber Goals and Objectives

As part of these comments, the Chamber will be recommending additional mitigation measures not considered in the DEIR. These mitigation measures are consistent with the following Chamber goals, and also offer an excellent means to keep San Francisco and the Bay Region's transit and transportation systems viable to meet our year 2000 transportation needs.

The Chamber's primary goal is to seek an alternative which ensures minimum negative impacts on commuter traffic to and from downtown and to ensure the maintenance of adequate capacity and movement for all regional transit operators. The rationale for the Chamber's goal is to:

- o Ensure minimum negative impacts on the movement of people and goods within the Financial District, and to Fisherman's Wharf, South of Market and China Basin areas;

- o Enhance transportation facilities for new residential/commercial development in Mission Bay, South Beach and Rincon Hill areas;

- o Eliminate conflict between the Mission Bay Development Plan and the existing underused I-280 roadway between 6th and 4th Streets; and

- o Select an alternative which is cost-effective and buildable with existing or obtainable funding, and which yields a net positive transportation benefit to both San Francisco and the Bay Area region.

Major Unavoidable Adverse Impacts

The DEIR identifies the following major unavoidable adverse impacts associated with freeway removal alternatives which the Chamber believes must be adequately addressed by mitigation measures:

- o **Removal of the Embarcadero Freeway (Alternatives III-VA) would significantly increase peak period congestion on surface streets in the surrounding area.**

1

Surface street performance (year 2000 PM peak) under the freeway takedown alternatives would deteriorate significantly as indicated in the following table:

	Number of Congested Intersections**	Block-Hours of Queuing
Freeway Takedown Alternatives* (Alternative III through VA)	49 to 78	68 to 139
"Do Nothing" or "Status Quo" Alternative	37	55

* This represents a range of performance for the five freeway removal alternatives depending upon the extent of mitigating traffic improvements.

** Congested intersection means that capacity has been reached. It represents the most vehicles that any particular intersection can accommodate. At capacity there may be long queues of vehicles waiting upstream of the intersection and vehicles may be delayed up to several signal cycles. In the worst case, vehicular backups from locations downstream or on cross streets may restrict or prevent movement of vehicles out of the approach under consideration.

- **The year 2000 PM peak period transit travel time would improve, but PM peak highway travel time would significantly deteriorate.**

  In comparing the City's preferred Alternative IVA to existing travel times, the average transit travel time would decrease, but travel times along highways and surface streets would increase by an average of three minutes for trips with origins and destinations within the Embarcadero Corridor (e.g. trip origin in the Financial District and destination at Fisherman's Wharf or the SP Depot Area). Highway and street travel times would also increase for trips with destinations outside the Embarcadero Corridor, and for trips passing through the study area.

2 It is important to note that the DEIR's surface street analysis assumes that congested intersections would "clear" prior to a traffic signal change and therefore traffic would not block or affect cross traffic. But the DEIR analysis concludes by noting that "in order to maintain clear intersections extensive manual traffic control of major freeway access corridors could be required. Without such manual traffic control intersection blockage could occur thereby disrupting cross traffic "(p. V-74). Clearly the I-280 decision-making Committee must take into consideration the often mentioned "gridlock" effect in the event that automobiles fail to clear intersections during the signal cycle, or incur drastically increased traffic control personnel costs. No doubt this gridlock situation would add significantly to surface street travel times and impact both goods movement and local and inter-city transit routes serving downtown. We believe that the DEIR analysis should not assume that all traffic will clear intersections. Unless the DEIR authors are recommending manual traffic control as a mitigation measure, which would require between 49 and 78 traffic control officers, the Chamber strongly urges a reassessment of this particular impact.

- **The City's preferred Alternative IVA would result in 3,800 net additional person-hours of travel time per day (year 2000 PM peak). This represents a net savings of only 100 person-hours, and compares to 3,900 person-hours for the status quo or "Do Nothing" Alternative.**

  All time savings identified for Alternative IVA are attributable to the following transit improvements:

  - Muni Metro Loop Turnaround. Allows reduction in headways, saving 1,000 person-hours.

  - Muni Metro extension to the SP Depot, saving 600 person-hours.

3 These time saving benefits would accrue only to intra-city, below the surface transit users on the Muni Metro subway system. Highway users and surface transit patrons would experience a significant increase in travel time (approximately 1,800 person-hours or about a 43% increase above the "Do Nothing" Alternative) due to the Embarcadero Freeway removal.

  The net result is that the positive effects due to improvements in transit are more than offset by delays on surface streets due to the Embarcadero Freeway removal. We believe that scarce public transportation funds are not being used effectively. It seems that this is a classic case where one broad public policy (transit first) is being implemented at a tremendous cost with little or no benefit.

With regard to the above discussion, the DEIR does not provide a clear and concise comparison describing the travel time savings attributable to each alternative's components. This lack of a "head to head" comparison, we believe, makes the DEIR a difficult to understand document, one which does not provide decision-makers accurate information.

The Chamber of Commerce recommends that the following corrective actions be taken. First, Tables 1-1 and 1-2 on pages I-17 and I-18 should be revised to clearly permit the evaluation of advantages and disadvantages for each alternative per the assessment of traffic impacts, actual travel time savings, and attainment of transportation goals. Second,
4 since the Muni Metro Turnaround project is fait accompli -- planned for implementation regardless of the outcome of the I-280 Transfer Concept decision -- why not do a "head-to-head" comparison for each alternative minus the obvious benefits (transit time savings) derived from the Muni Metro Turnaround project. As it is now written, the DEIR provides only a marginal discussion of the travel time savings (page V-74), but does not detail how much savings are contributed to each alternative by the improvements to transit.

5 o **The DEIR's rating system for goods movement only assessed the Waterfront corridor study area. Ratings for the Financial District are said to be lower for the freeway removal alternatives due to congestion spillover. The DEIR should evaluate impacts for the Financial District.**

Issues related to Adverse Impacts

Procedural DEIR Review and Decision Making Process

6 The Chamber requests that an explanation be included detailing the respective roles, if any, played by the California State Legislature, the Federal Urban Mass Transportation Administration, the Metropolitan Transportation Commission, Caltrans, the Federal Highway Administration, and the City of San Francisco in the selection and implementation of a preferred Alternative as per the I-280 Transfer Concept Program. The explanation should include the identification of legally available sources of funding earmarked for the removal of the Embarcadero Freeway.

Senate Concurrent Resolution SCR 74 Relation to I-280 Transfer Concept Program DEIR

7 The Senate Concurrent Resolution (SCR) 74 study will be submitted to the State Legislature by March 1, 1985, and the I-280 Transfer Concept Program (TCP) DEIR public comment period closes November 30, 1984. The San Francisco Chamber of Commerce requests that the I-280 Public Comment period remain open pending the Legislature's decision regarding a system plan and incremental improvement plan for the San Francisco-San Jose Corridor. The Chamber requests that no decision be made with respect to any I-280 TCP alternative elements which now serve or are planned to serve San Francisco's inter-city highway and transit needs. Only in this way can a realistic assessment of the I-280 TCP alternatives be made.

Aesthetics and Property Development Potential

8 Without doubt the compelling rationale for removing the Embarcadero Freeway is one of aesthetics and urban design. However, under the provisions of CEQA the environmental document is intended to provide decision-makers with an objective and balanced source of information. The DEIR however should be more explicit in noting that the benefits of removal are aesthetic, and that removal does not reduce street level traffic.

9 Any discussion concerning development potential should include the likely case of "no or very low" level of development. Since local decision-makers are strongly influenced by advocates of restrictive growth policy in San Francisco, it would seem likely that any lands freed for developement would be subject to height and bulk restricttions making developments prohibitively expensive.

Rincon Hill Residential Development

Surface street performance in the Rincon Hill area would deteriorate significantly if the Embarcadero Freeway were removed. First Street between Harrison and Folsom would experience automobile queuing for about three hours during the P.M. peak period. San Francisco, through extensive investments in public infrastructure, hopes to establish a significant new residential neighborhood in the Rincon Hill area. For the portion of First Street described above, the Rincon Hill Plan calls for the creation of a pedestrian street network. The DEIR is inadequate in its discussion of consistency (or inconsistency) between the I-280 projects and the Rincon Hill/South Beach development plans.

10

Regional Impacts

The DEIR should explicity identify the additional P.M. Peak person-hours of transit time which would accrue to passenger vehicles and goods movement through the study areas due to increased street level congestion from the removal of the Embarcadero Freeway. Such an analysis is required by regional decision-makers to understand the implications of what some are describing as a "San Francisco decision" on the freeway removal.

11

Chamber of Commerce Alternative

To prevent these unmitigated impacts the Chamber recommends a combination of element treatments to ensure adequate and efficient future transit capacity and to reduce capital cost requirements. By adopting the lion's share of Alternative IVA, minus the Embarcadero Freeway removal, it is possible to significantly reduce the I-280 Transfer Concept fund shortfall and accommodate future transportation needs. The elements of the Chamber's alternatives are detailed as follows, together with costs associated for each element.

1. Pull back I-280 stub end to 6th Street and connect with street system. Cost $23.3 million. A portion of this cost would be paid by Santa Fe as part of the development agreement for the Mission Bay Project.

12

2. Reconstruct Embarcadero surface roadway to four lanes throughout (and up to six lanes where appropriate without freeway takedown). Cost $29.2 million.

3. Muni Metro from Embarcadero station to SP Depot with turnaround loop. Cost $73 million.

4. Muni E-Line from Fort Mason to SP rail-line depot, with a Muni F-Line connection along Market Street. Cost $23.1 million.

5. I-280/Embarcadero Street and ramp modifications. Cost $4.5 million.

6. Intercept parking in I-280/Embarcadero area. Cost $36 million.

7. Transportation Systems Management (TSM) improvements along northeastern Waterfront. Cost $1.3 million.

Total cost of these elements minus the cost of the Embarcadero Freeway removal equals about $175 million. The I-280 Transfer Concept fund shortfall per the above improvements would equal about $70 million. The City's preferred Alternative IVA shortfall is about $189.34 million.

It is estimated that the Chamber's proposed alternative would lengthen the year 2000 P.M. peak person-hours travel time by 800 hours. This estimate assumes an added 2,400 person-hours for highway users, plus 1,300 person-hours for transit users due to surface street congestion effects, minus 2,900 person-hours due to transit improvements. This compares extremely favorably to the "do nothing" alternative (3,900 net additional person-hours) and the preferred Alternative IVA (3,800 net additional person-hours).

Additional Mitigation Recommendations

In the event that Alternative IVA, or any other alternative involving freeway removal, is selected, the following Chamber mitigation recommendations should be evaluated for feasibility and incorporated prior to implementation.

1. Washington Street at the Embarcadero Roadway should be one-way westbound, and Clay Street should be extended eastbound from the existing on-ramp to the Embarcadero Roadway along an efficient alignment to partially compensate for the loss of the on-ramp.

2. Howard Street, between Spear Street and the Embarcadero Roadway should be one-way westbound. Signalization at the Howard Street and the Embarcadero Roadway should be estimated if possible, or minimized at least, to facilitate flow to the on-ramp.

13

3. The Muni Metro breakout should occur south of the intersection of Howard and Steuart Streets (under the Howard Street on-ramp) to avoid conflicts at this intersection.

4. To ensure adequate Embarcadero Roadway capacity the following additional lane assignments should be considered:

   - North of Broadway (six lanes) three lanes each way to the vicinity of Pier 39.

   - South of Folsom to King Street (six lanes) three in each direction

   - King Street to I-280 on and off-ramps, three lanes westbound for PM peak and two lanes eastbound

   - Folsom Street to Broadway, five lanes southbound at least during the P.M. peak, and three lanes northbound. The fourth and fifth lanes might be obtained by permitting peak-period automobile use of the Muni E-Line

southbound lane, and by enforcing towaway restrictions on the parking lane.

5. Evaluate the feasibility of a second general purpose traffic lane or high occupancy vehicle (HOV) lane westbound on Bryant Street from the Embarcadero Roadway to feed the Sterling Street on-ramp.

The Chamber of Commerce sincerely appreciates the opportunity to provide comments for I-280 TCP DEIR. It is this organization's hope that your decision results in the wise use of public resources to benefit both San Francisco and the Bay Area region.

Sincerely,

John H. Jacobs
Executive Director

JHJ:sl

cc: (See attached)

cc: Governor George Deukmejian
Mayor Dianne Feinstein
Mayor Lionel Wilson
San Francisco Board of Supervisors
Supervisor Tom Torlakson, Contra Costa County
Supervisor John George, Alameda County
Supervisor Bill Schumacher, San Mateo County
Honorable Don Boatwright
Honorable John F. Foran
Honorable John Klehs
Honorable Bill Lockyer
Honorable Milton Marks
Honorable Robert W. Taylor
Honorable Louis J. Papan
Honorable Nicholas C. Peters
Kirk West
Dana Reed
Leo Trombatore
Ralph Stanley
Angelo Scracusa
Michael McGill
Policy Control Committee
Valance Gill
Burch Bachtold
Dean Macris
Other Agencies
Urban Mass Transportation Administration, Region 9
Division Director, Federal Highway Administration
Director, Region 9, Environmental Protection Agency
State Office of Intergovernmental Management
Executive Director, San Francisco Public Utilities Commission
Executive Director, California Transportation Commission
Bay Area Rapid Transit District
Golden Gate Bridge Highway and Transportation District
Alameda-Contra Costa Transit District
Metropolitan Transportation Commission
San Mateo County Transit District
Chief Administrative Officer, San Francisco
Port of San Francisco
San Francisco Redevelopment Agency
San Francisco City Planning Commission
General Manager, San Francisco Municipal Railway
Media
San Francisco Chronicle
San Francisco Examiner
Oakland Tribune
Contra Costa Times
San Francisco Business Journal
San Jose Mercury News
San Francisco Progress
KRON
KPIX
KGO
KQED

KTVU
KGO-Radio
KCBS
KNBR
KBHK
San Francisco Chamber of Commerce Board of Directors

RESPONSE TO COMMENT LETTER G-19

G-19.1: The DEIR identifies the major unavoidable adverse impacts of the Embarcadero Freeway removal as follows:

> Removal of the Embarcadero Freeway (Alternatives III-VA) would increase peak period congestion on surface streets in the Embarcadero Corridor. The extent of congestion for each alternative varies depending upon the extent of mitigating traffic improvements (e.g. new ramps to the Embarcadero roadway). Street congestion would also affect transit operations. Impacts on surface street performance would be largest for Alternative III, followed by Alternative IV. Alternatives IVA, V and VA would all have similar street performances, and would mitigate the impacts of Alternatives III and IV. (Page VII-3)

It is the finding of the I-280 study that surface street performance (year 2000 p.m. peak) under the freeway removal alternatives would be worse than the "do-nothing" alternative. It is also the study's finding that peak period queueing exists on the Embarcadero Freeway and will continue to exist in year 2000 under the "do-nothing" alternative. All or portions of the freeway queueing would be transferred onto surface streets under freeway removal alternatives, depending upon the level of mitigations proposed in each alternative.

Congestion at intersections indicates the existence of queueing. Vehicles have very little or no freedom to maneuver when queueing is present. However, it does not mean a total stoppage of traffic flow at all congested intersections. Vehicle queueing is dynamic, moving typically at an average rate of 4 to 5 miles per hour including signal delay. Where queueing is extensive for long durations, vehicle speeds average approximately 2 miles per hour. Please see Working Paper 2.2.2, Transportation Performance Measures, for more detailed discussions on intersection congestion and queueing.

G-19.2: As explained in Response to Comment G-19.1 above, vehicle flows on approaches to a congested intersection will still be moving, but under queueing conditions. Not every intersection identified as "congested" will experience a total blockage of traffic in the 2000 p.m. peak period. However, it was recognized in the DEIR that due to uncertain behavior of traffic under

extensive queueing for long durations, intersection blockage could occur in the absence of traffic enforcement in major freeway access corridors. The number of locations where traffic enforcement could be required to keep cross street traffic and local traffic moving would be about one-fourth of the number of congested intersections identified under each alternative (10-20 intersections). It should be noted that peak period manual traffic control has been in use at locations near the Bay Bridge approach ramps.

G-19.3: Comment noted. The Chamber's analysis and conclusions are consistent with the I-280 study findings.

G-19.4: Comment noted. Transit and highway travel times were calculated for selected representative trips (Table E-1, page A-43 and Table E-6, page A-48). These travel times reflect the combined effect of all the components of an alternative on the average speed of the assumed route for each representative trip. While the overall effect on speed changes was estimated based on the resulting level of congestion, it will be difficult, if at all possible, to estimate the proportional effects of individual components on speed changes for each representative trip. However, it is evident that a major cause for increased travel times for highway and surface transit users in the freeway removal alternatives is the proposed removal of the Embarcadero Freeway. This information has been provided in the DEIR.

The Muni Metro turnaround loop was a "proposed" project at the time when the I-280 TCP alternatives were analyzed. The project was included as part of the Muni Metro extension element so that its alternative designs (turnback vs. loop) and their advantages and disadvantages are investigated and results used in the detailed design for that project. Per the Chamber's own estimate, if the turnaround loop were treated as an existing project it would reduce the total additional person-hours of travel of Alternative I (the do-nothing alternative) by 1,000 person-hours. This would make Alternatives IV, IVA, V and VA less attractive than Alternative I with respect to travel time savings.

G-19.5: The impacts on goods movement in the Financial District and other parts of the study area were evaluated as part of surface street traffic and parking in Sec. V.C.2 of the DEIR. More detailed information can be found in Working Paper 2.2.2, Transportation Performance Measures.

G-19.6: The selection of a locally preferred alternative will be a joint effort of the State of California (through Caltrans), the Metropolitan Transportation Commission, and the City and County of San Francisco. The roles to be played by the various federal, state, regional and city agencies in implementing the preferred alternative were described in Sec VII.D.1, Affected Government Agencies. The potential sources of funding for the I-280 TCP elements were described in Sec. V.B.2, Financial Feasibility. No legally available sources of funding have been earmarked for the removal of the Embarcadero Freeway. The eligibility of this element for Interstate Transfer Funding is yet to be determined by FHWA/UMTA.

G-19.7: Comment noted. Adequate public review and comment period on the DEIR has been provided per CEQA. It was stated on the "Notice" following the title page in the DEIR that no decision will be made with respect to any transit elements that involve the San Jose - San Francisco Transit Corridor pending completion of the SCR-74 study. Chamber's requests for an extended public comment period on the DEIR and for not making a decision with respect to any I-280 TCP alternative elements which now serve or are planned to serve San Francisco's inter-city highway and transit needs, are noted herewith for consideration by the decision makers.

G-19.8: Comment noted. The points referred to in the comment were noted in the DEIR. Please see Response to Comment G-19.1.

G-19.9: Parcels freed by demolition of the Embarcadero Freeway are identified in the DEIR. As noted by the Chamber, the development potential of the freed parcels will be subject to the City's land use controls and policies. Please see Response to Comment C-2.1 and C-2.2 for more discussion.

G-19.10: Consistency between the I-280 TCP elements and the Rincon Point-South Beach Redevelopment Plan was discussed in Sec. VII.D.2, Relationship to Plans (pages VII-14 through VII-23). Please see Response to Comment C-2.3 for discussion on Rincon Hill Plan.

G-19.11: About 2.8% of the highway person trips in the study area during year 2000 p.m. peak period would be regional through trips (trips with origins and destinations outside San Francisco but going through the corridor). Therefore, the

additional p.m. peak person-hours of travel which would accrue to these regional through trips due to increased street level congestion from the removal of the Embarcadero Freeway would be about 3% of the additional person-hours for highway users shown in Table I-2 under each alternative.

G-19.12: The Chamber's recommended alternative is noted. As stated by the Chamber, this alternative adopts the lion's share of Alternative IVA with two exceptions: (1) the Embarcadero Freeway will remain as is, and (2) the Embarcadero surface roadway will be reconstructed to four lanes throughout as in Alternative II or VI. The Chamber's recommended alternative eliminates the traffic impact of the Embarcadero Freeway removal and substantially improves transit services in the study corridor, but it falls short of the land use and urban design benefits of Alternative IVA.

The total cost (1983 dollars) of the Chamber's alternative should have been about $195 million rather than the $175 million estimated by the Chamber. This is because the Chamber's costs for individual elements already exclude the Embarcadero Freeway removal, and the cost of the Embarcadero surface roadway would be about $5 million more than in Alternative VI due to pull back of I-280 stub end to Sixth Street. Based on 8% inflation rate, the I-280 Transfer Concept fund shortfall of the Chamber's alternative would be about $157 million compared with $189 million for Alternative IVA.

It is estimated that the Chamber's alternative would add at least 1,600 total person-hours of travel during year 2000 p.m. peak period, rather than 800 person-hours indicated by the Chamber. This is because without the Embarcadero Freeway removal, savings in person-hours of travel due to transit improvement would be less than in Alternative IVA (2,100 person-hours) and significantly less than the 2,900 person-hours estimated by the Chamber. However, this still compares favorably to Alternative I (3,900 total person-hours) and to Alternative IVA (3,800 total person-hours).

G-19.13: The Chamber recommended additional mitigations to Alternative IVA are noted. These additional mitigation measures will be studied and incorporated into the design if feasible, should Alternative IVA be selected for implementation.



December 6, 1984

Mr. William Chastain
I-280 Transfer Concept Program
Caltrans
P.O. Box 7310
San Francisco, CA 94120

Dear Mr. Chastain:

Some overview comments on the I-280 DEIR are offered to give a context to more detailed comments which follow.

Throughout this EIR the focus on moving commuters into and out of San Francisco during rush hour hinders analysis of impacts that are felt, and transportation that is needed, for non-office uses, in particular tourist oriented uses in the Fisherman's Wharf area and the needs of the fishing industry which still is located on the northern waterfront. Analyses are done of problems encountered by downtown commuters, but the problems encountered by recreational visitors and industrial users are minimized.

1

For example, tables which compare cost and frequency of transit services often omit information about costs of the trip into San Francisco. Families from the suburbs who come into San Francisco on a weekend, or in the summer with visiting relatives, do not look at the cost of the trip the same as a regular commuter. Even with parking costs, the number of passengers in a car may by itself make unlikely any conversion to transit simply due to the amount of money it would cost a family for 4 or 5 round-trip fares from a home in Livermore. The other factors which similar recreational users may factor in -- including the convenience of carrying small children, packages and out-of-town visitors -- make it much more unlikely that they will switch to transit.

And to the extent that the projects approved attempt to force people to switch transportation modes by making their lives miserable, the agencies approving those changes may instead harm a vital segment of our local economy -- regional visitors and tourism.

You have received separately comments from Standard Fisheries. The comments they submitted focus on the particular problems they encounter with the hours worked, usage of heavy trucks in early morning hours, required access for customers who pick up fish and other problems associated with being an increasingly isolated industrial

maritime use on the waterfront. Their problems, while more exaggerated because of the nature of their business, are not unique. Commercial establishments on the northern waterfront are heavily dependent on trucks for deliveries, many of which are making deliveries from locations outside San Francisco. Disincentives for downtown commuters to travel by auto will lead to increased delivery times, costs and inconvenience for commercial vehicles that CANNOT switch their deliveries to a streetcar or BART.

2

Anchorage - truck deliveries 8:30 - 11 am from entire Bay Area
- customer peak 12:30 - 3

Cost Plus - three times weekly delivery of containers 7 am - noon

Everyone of the establishments surveyed is concerned about the possibility of the stretching out of "rush hour" in the morning. As commute time expands, it will affect the time of deliveries. Businesses which depend on daily deliveries of certain goods cannot afford the cost or uncertainty of delayed delivery trucks. They must be able to serve their customers and do not want to have to absorb increased costs.

Delivery vehicles using the Central Freeway, the Embarcadero Freeway and other segments of the Bay Bridge approaches currently have "escape" valves when an accident or other blockage of traffic occurs. To the extent vehicles are "stuck" on the freeway system and have reduced options, the congestion on that system with increase.

3

Whether or not the downtown office work force takes transit or drives their cars, our businesses need relatively free-flowing traffic in the early morning hours for truck deliveries. Making us have to pay the price of too many commuters from the East Bay would be an economic disaster for the City.

The second problem which must be confronted in this study is the problem of parking. The "transit first" policies which discourage commute auto traffic by restricting parking spaces may work for daily peak hour commuters. Our customer pattern is different. We have heavy weekend usage, especially in the summer. The times our customers arrive are those when transit service -- even that planned in these alternatives -- is infrequent and sometimes unreliable. As long as the transit agencies put the bulk of their equipment and the bulk of their workers on schedules to accommodate the downtown office worker, the City and region will reduce service on weekends.

4

Our busiest times are as follows:

Cannery - August, July, September, December

Cost Plus - November, December + summer tourists

Sheraton - April 15 - November 20

No matter what month is heaviest for any establishment, we all peak on holidays -- another time when transit is infrequent and unreliable. Labor Day and the day after Thanksgiving are

heavy customer traffic days for us.

One of the main problems our customers encounter is inadequate signing to locate their destination. In addition to the cable car reconstruction and routine digging up of our streets, a visitor to the Fisherman's Wharf area is confronted with a street system that is confusing and a directional signing system that is virtually non-existent.

5 A mitigation measure that could alleviate some of the traffic caused by lost souls wandering around seeking their destination, would be a uniform, visible signing system that had clear directions to parking and to such major areas as Fisherman's Wharf. This signing system is particularly needed on Van Ness and Columbus Avenues.

A second mitigation measure, if the Embarcadero Freeway is allowed to remain, is consideration of switching the directions on the Battery and Sansome pair, especially north of Broadway. Until the change over a decade ago, traffic exiting at Broadway could turn north to head for the Wharf. Now that traffic has to exit from the freeway, knowing to stay in the right lane, go uphill one block and then turn
6 right -- if they don't miss the signs. This pattern has resulted in dumping a substantial amount of unnecessary traffic on Broadway and on Columbus. Both streets are heavily congested and should not have to bear such a substantial burden of through traffic. Other modifications would obviously be necessary to transit routes, but the current pattern creates a lot of chaos and congestion.

A third mitigation which should be considered -- for each roadway segment of each alternative -- is exclusive lanes for trucks, especially in am peak hours. Trucks are the lifeblood of the City's economy. Most of the goods and edibles on which San Franciscans depend, arrive in trucks. Very few deliveries can be made on transit. Trucks need wider lanes than many of the narrow lanes in the alternatives. Trucks also need easy access to the freeways and to the bridges. Serious consideration must be given to developing
7 an integrated truck delivery system for each alternative that is being given attention for adoption. The EIR should attempt to figure out multiple ways deliveries could be made from various places in the Bay Area into the waterfront area. If it makes sense to encourage truck deliveries from San Mateo via I-280, the touch-downs must lead directly to wide, easily accessible lanes or relatively uncongested streets. Since crossing Market Street is difficult on northbound streets, especially when the destination is Fisherman's Wharf, the roadway system along the waterfront must be designed to provide for the needs of heavy truck traffic. If it is not

available on the freeways or on wide surface roadways, traffic will be increasingly diverted onto Van Ness, 9th Street and 3rd Street. The impacts on those streets are not analyzed here. They are a critical roadway resource and will have even more traffic if it becomes overly difficult to approach the Fisherman's Wharf area from the south along the eastern waterfront.

A final observation and objection. Alternatives which force surface roadways along the waterfront to become storage areas for cars unable to get on the Bay Bridge in the rush hour, will have serious economic and environmental impacts. The City, as well as the merchants on Fisherman's Wharf, have a vital interest in keeping the City attractive for tourism. A substantial portion of our visitors come from other places in the Bay Area. If the daily commute hassles become part and parcel of every driver's experience in San Francisco the City will soon lose its economic diversity. An office worker may have not choice in where she goes to work. A family who wants to entertain guests for an evening or on a summer weekend has other alternatives in the Bay Area. They expect some congestion in San Francisco. What will turn them away is repeated experiences in traffic jams that waste their time and increase their frustration. The City cannot afford to let that happen.

8

Chapter IV - Environmental Setting

9 As is noted in our general comments the limitation of the study area for evaluating impacts (IV-2) is a matter of concern. Traffic will seek other routes if congestion occurs in one corridor. Trucks may exit and go up Van Ness; passenger autos make take a surface street across Market and connect to Columbus Avenue, Stockton Street, Franklin, or other of the "relatively" flat routes. Easing pressure in one area may well produce popped up effects elsewhere.

10 Land Use Maps A-C illustrate the difficulties in the broad designations you have used here. "RE" includes everything from small scale restaurants on the Wharf to the entirety of the Embarcadero Center complex (an error?)to interior designer's establishments. Map B illustrates the different land uses west and east of the Embarcadero. Changing the nature of that roadway may make it totally impossible for the waterfront to fight off office use as dominant. The street there effectively acts as a barrier.

11 IV-18 notes that economic and social changes South of Market will decrease use of large transport vehicles to move goods and materials. It is hard to tell whether this is a projection or a self-fulfilling prophecy that will justify making truck traffic along the Embarcadero a low priority in this project.

12 IV-20 - This map has impossible-to-read street names; it omits projects under construction and under review in the Fisherman's Wharf area (Marriot - Columbus & North Point, Pier 45) plus two more hotels which are under discussion. Maritime improvements, such as the breakwater, and the Jefferson seawall lot, should also be included. Also missing the new Cost Plus. When you say "new construction" when did you mean that it came on line? Number the piers.

13 IV-21 - The sketchy description of Fisherman's Wharf is totally out of scale with the extensive description given to all the new office projects along the waterfront. On a busy day there are 100,000 people in that area. It is the major tourist destination in the Bay area, and is heavily used in summer and on weekends.

14 In this section, in general, there is insufficient description of the unique traffic pattern and usage in Fisherman's Wharf. On weekends the financial district is deserted and the streets relatively free-flowing. On weekends the Wharf has its heaviest traffic, much of it tourist-related, and highest demand for parking. On page IV-24 you acknowledge the needs of the merchants for convenient car and transit access and sufficient parking. Thank you. Please remember this in your decisions on which alternative and what mitigation measures to implement. The transportation "solutions" for

are not "solutions" if they don't address the needs of the people in the area.

15 IV-36 - In light of the discussion on the previous pages on pedestrian activity, the description of the Wharf seems insubstantial. Much of the congestion in the Wharf is pedestrian congestion -- on the sidewalks, in intersections, in open spaces. Virtually everyone who comes into this area walks to their final destination. The number of pedestrians is downplayed, especially when you call the Ferry Building area an area of heavy pedestrian activity.

16 Photos IV-38 - IV-43 - no time or date; those of Aquatic Park and the Wharf obviously are not peak periods.

17 IV-45 - The first partial sentence appears to imply that "narrowed streets ending in the congestion of commercial activity at Fisherman's Wharf" is somehow bad.

18 IV-50 - The discussion of the Urban Economy misses the boat. There is too much emphasis here on office growth. The Commerce & Industry Element of the Master Plan gives valuable emphasis on encouraging economic diversity. Non-office uses are much more likely to employ San Franciscans, for example. Uses in the Wharf area help keep the City's economy vital and diverse. The City supposedly has policies to help economic diversity. This important aspect of development needs to be stressed.

19 When you read IV-64 and IV-75 against each other it is impossible to conclude anything other than that traffic and transit from the East Bay is a serious problem. BART is 17% over capacity. The Bay Bridge is claimed to be only at 100% -- a figure many drivers would probably challenge, especially in the a.m. rush hour.

20 IV-66 - IV-67 - Wherever you have "zone fare system", tell us what the minimum fare is to San Francisco and what is the maximum. For the purposes of this study it is irrelevant what the fare is between two East Bay locations. The information for headways on weekends illustrates why automobile transportation is so critical to the Wharf. Headways of 20 to 120 minutes will not accommodate our patrons, especially if the system leaves them off in the financial district and they then have to transfer to another transit system (after another wait).

21 IV-68 - The projection of 20,000 new housing units in San Francisco by the year 2000 appears to be wishful thinking. Based on past history, even 1/2 that much will be a windfall. How will commute traffic increase if you decrease San Francisco housing by 1/2? Especially if you add in the Downtown Plan "caveat" later in that paragraph that states that there could be 30% more development in San Francisco than that here analyzed.

22 IV-70 - How many of the programs in "five-year plans" actually have money in the bank and are assured of construction? How would the table on page IV-72 change if only projects with assured funding were included?

23 IV-77 - The queuing in the East Bay corridor on the Bay Bridge is very serious. Given those congested conditions truck traffic will have a very difficult time accessing customers and suppliers in San Francisco. This needs specific mitigation of its own because it is not divertable to transit.

24 IV-86 - IV-87 - This description of Goods Movement is a good starting point. What needs to be acknowledged is that with the commercial "upgrading" of deep south of Market, areas which trucks could freely operate are now restricted due to the volume of traffic and pedestrians in the area. Businesses which depend on trucks can be forced out of business simply by making it impossible for deliveries and shipments to occur. For example, the changes in use of Second Street. This needs to be pointed out.

Chapter V - Environmental Impacts and Mitigation

The information which this chapter provides is valuable but it also illustrates the problems encountered in analyzing the impacts of these alternatives.

25 Pages V-5 and V-10 show the "development" impacts in the Fisherman's Wharf area to be uniform in all of the alternatives -- since they each create one new potential development site on the same piece of land. The latter page also acknowledges that the Jefferson Street transit mall is an option for Alternative II.

26 Page V-12 notes that all alternatives would except IV-A would reduce automobile access while providing better transit access along Jefferson and Beach Streets. While that paragraph is full of unsupported conclusions, it at least makes an attempt to describe "benefits" and "demerits." Other sections do not.

27 In those pages the EIR attempts to describe the new developable land (or parcels lost) in each area. It is easy to see the connection between a particular transportation project and the land values in the immediate area. It is much more difficult to explain the results of a decision deep south of Market on the Wharf area. Yet that is what is required. Page V-7 describes the wonders of new developable land in the Mission Bay area if I-280 were chopped back to Sixth Street. Then you look at page V-68 which supposedly describes the traffic impacts of Alternatives IV and IV-A, which include that freeway removal, and a graphic depiction on page V-60. The impacts are seen mostly in the mid south of Market area. And on some stretches of the Embarcadero south of Broadway.

28 I-280 is one of the major traffic routes from the Peninsula. It carries a substantial amount of truck traffic. It is hard to see from the information presented how this will affect the ability of people and vehicles -- especially non-commute vehicles -- to move in the area along the waterfront.

29 The surface street performance charts seem very optimistic. Alternatives IV and IV-A show 1-2 hour delays in pm peak along the Embarcadero. But both end abruptly at Broadway. Why will the problem magically disappear at that intersection? Traffic in the Embarcadero corridor accessing the freeway is already heavy due to increased office development on the northern waterfront. Alternatives I and VI already show a queuing on the Embarcadero Freeway itself back to Washington Street on a structure that is in its own way a "protected environment." Once an auto is on that structure there is no cross traffic, no pedestrians and few conflicts except merging vehicles.

Further on in this section, V-79, an attempt is made to deal with "goods movement." There is no analysis of the cost in time and money of added delays to shippers and to their customers. Persons commuting through this corridor may "pay" a price of 10 extra minutes on their evening commute. Persons driving down the waterfront to see the views may not particularly care about the traffic. But when daily delays force a business to drop stops on its route or otherwise adjust their schedule, they will have a direct cost passed on to them. The "conflicts" which are noted in this same section, will also have the same costs. If the City is to retain a diverse business community, and not focus all its energy on moving office workers into and out of the financial district, these problems have to be given much more serious attention.

30

Surface roadways that carry traffic now on elevated freeways have to be designed to meet the varied demands of users of the waterfront. Some of those demands are office commuters, some of them are the visitors who come into the Wharf area. Many of them are those of commercial vehicles on which we are dependent for our livelihood and to service our businesses.

31

Alternative IV-A, as a model to illustrate our concerns, shows the information we want to come out in this EIR. (First, the map on III-39 needs correction. You show the Embarcadero Roadway ending at Stockton, but the text shows it to end at Powell.) We would like something more than rhetoric about the benefits of a pedestrian mall. This EIR just seems to assume that it would be a positive thing. We agree that one of the major transportation problems is the conflict between pedestrians in crosswalks and cars making turns. A pedestrian mall could reduce those problems. However, assumptions about commercial activity have not been borne out in the myriad of cities and small towns which have seen such malls as their "salvation." We would like more information on this.

32

A second concern about the proposed pedestrian mall is the lack of access, as planned, from commercial vehicles. Most of our truck traffic occurs in the morning hours before the tourist crowds. Commercial areas north of Jefferson, especially in Fish Alley, are dependent on access for trucks and service vehicles. It should not been seen as a compromise to the proposal for provision to be made for our businesses. But if that is to occur the roadway will have to be sufficient to carry the loads on the trucks and with a surface treatment that is appropriate to both circumstances. Standard Fisheries has submitted comments separately. Their concerns about access need to be addressed. If the City is going to seriously pursue this alternative input from persons with an understanding of the demands of commercial traffic is necessary.

33

Finally, our concerns about maintaining a decent supply of on-street parking for our customers, requires us to ask that you design so as to minimize loss of parking spaces. While the City may want to encourage transit usage, and provide an attractive system, the varied needs of our customers and employees mean that we are going to continue to have a parking deficit.

34 It is very difficult to understand what the various alternatives plan for the end of Columbus Street. The maps for Alternatives 2, 3, 4A, 5 and 6 have variations on the theme of some sort of plaza. But the indicated "street modification" is not adequately described in the text (and sometimes not at all) nor is it clear what will happen in each alternative to Leavenworth or Beach Streets. Please explain the various alternatives and their impacts clearly. That area is a city park, Joseph Conrad Square. Please list this as an open space resource as well.

The Fisherman's Wharf Merchants Association is appreciative for the one week extension to prepare our comments. We hope that the outcome of this project will be in the best interest of San Francisco and the Bay Area.

Very truly,

Christopher Martin

Christopher Martin
President

CJM/ah

RESPONSE TO COMMENT LETTER G-20

G-20.1: With respect to transportation impacts, the DEIR focuses on the p.m. peak period because impacts during this period will be most severe to most of the transportation system users. The impacts during this period will be felt by all users including non-commute travel. The Fisherman's Wharf area is one of the six segments of the corridor analyzed in the I-280 study. The impacts on this segment were addressed at the same level of detail as for the other five segments. Please also see Response to Comment G-7.1.

The cost figures presented in the DEIR are capital and operating costs of proposed highway and transit improvements for the corridor. They are not out-of-pocket costs to individual users of the system. It is acknowledged that recreational users and commuters have different user costs and there are other factors which will influence their respective modal choice. It is also acknowledged that the proposed changes in the highway system, in particular the Embarcadero Freeway removal, would impact recreational users and delivery services more than the office workers because of their reliance on highway travel. However, the intent was not to force visitors and tourists to switch transportation modes. Rather, a major objective of the proposed transit improvements for the corridor, in particular the E-Line, is to provide an improved transit connection between the Fisherman's Wharf area and other parts of the city, in order to serve tourist activities in the area. The proposed transit improvements would offer an alternative mode of transportation to commuters and tourists and thus helping to mitigate the impacts of highway changes on those who must rely on highway travel.

G-20.2: Please see Responses to Comment Letter G-7 from Standard Fisheries Corporation.

G-20.3: Inbound traffic in the regional highway corridors is at, or approaching, the capacity. A lengthening in the morning peak period could occur in year 2000 on the regional freeway systems, with or without the Embarcadero Freeway removal. The proposed transit improvements for the corridor, together with

increased transit capacities in the regional corridors, would help to mitigate the impact of freeway congestions on truck traffic during the morning peak period.

G-20.4: The parking and transit need patterns of the Fisherman's Wharf area are acknowledged. An objective of the proposed E-Line is to improve existing transit services to the area. Should the E-Line be selected for implementation, an operations plan will be developed to recognize the unique needs of the area, and specific measures will be worked out together with residents and businesses in the area to mitigate the impacts of E-Line on loss of parking.

G-20.5: An improved roadway signing system for the waterfront area is included in the TSM improvements for all of the I-280 TCP alternatives.

G-20.6: Suggestion noted. This is a suggested mitigation to the existing traffic system. It could be considered should Alternatives I, II or VI be selected for implementation.

G-20.7: The proposed concept designs for the I-280 touch-down, the Embarcadero surface roadway and the new on- and off-ramps to the Embarcadero Freeway reflect the use of these facilities by trucks. The detailed designs for these facilities will incorporate standards and other requirements for large trucks. Please also see Response to Comment G-7.4 for truck use of transit lanes and Response to Comment G-7.8 for truck use of the Van Ness Avenue corridor.

G-20.8: Comment noted.

G-20.9: The study area described on page IV-2 is for land use impact analysis only. As explained on page IV-1, the study area analyzed in each section of the DEIR varies according to the probable extent of impacts and the level of details required in the impact analysis. The transportation impact study area is much larger than the land use study area and includes citywide and regional data.

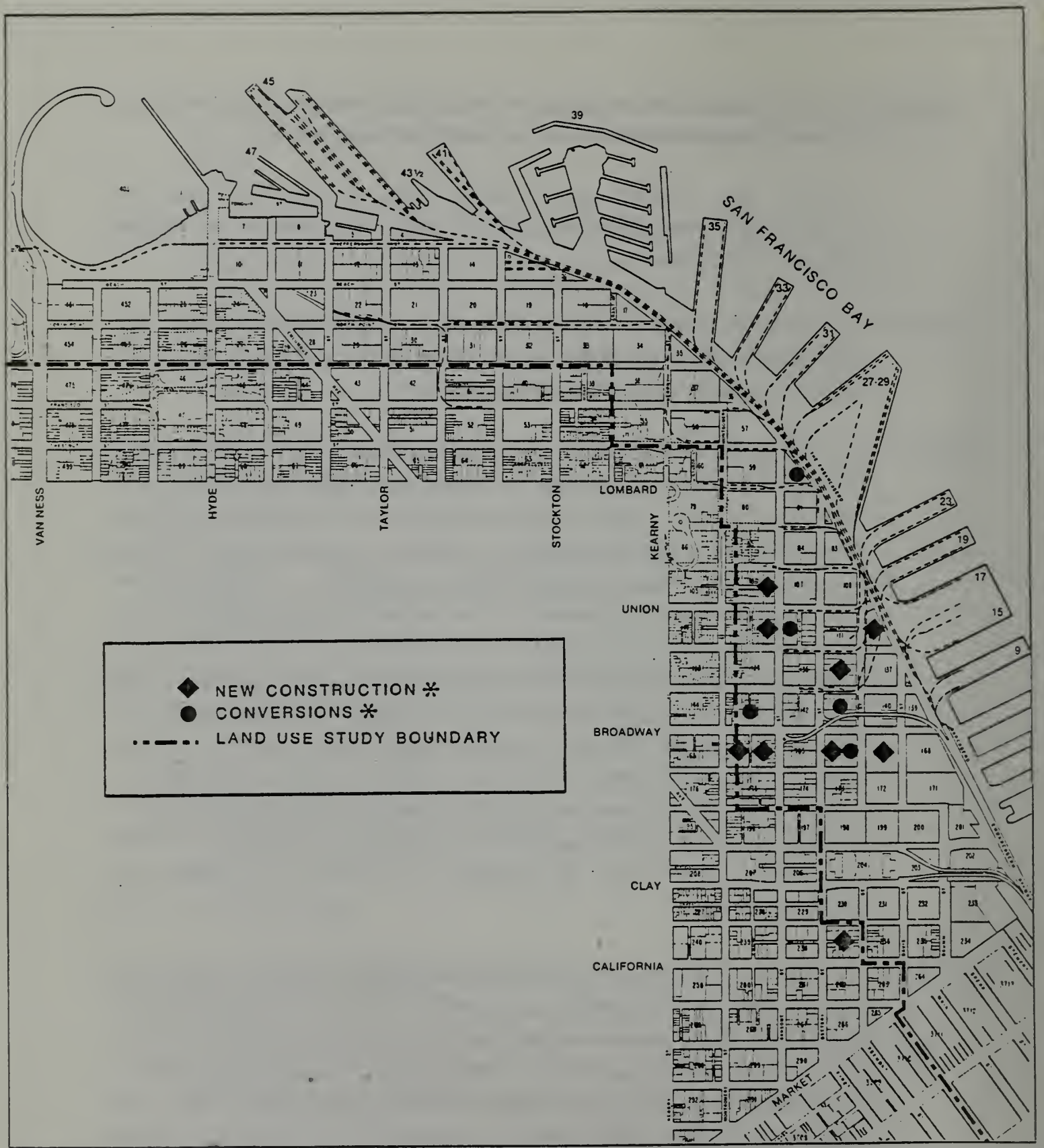
G-20.10: The land use classifications attempt to reflect the dominant use of a building. In cases of one or more major uses, two classifications are used.

Land use Map B (IV-2), pages IV-6 and IV-7, is revised to show the Embarcadero Center buildings as "O/RE," indicating office use as well as retail, restaurant, etc.

G-20.11: The statement on page IV-18 should be interpreted to mean that economic and social changes South of Market will decrease goods movement generated in that area requiring use of large transport vehicles.

G-20.12: Figure IV-8, Cumulative Development North of Market, page IV-20, has been revised. Some street names have been added for orientation and the piers have been numbered. Please see revised Figure IV-8 on the following page of this Addendum. The purpose of the map is to indicate major office development and retail projects under construction. Thus, maritime improvements, such as breakwaters are not included. Information for the map comes from "Cumulative Downtown Office Development in San Francisco as of March 10, 1984," which was the most recent list available from the City Planning Department at the time the DEIR was published. Hotel projects are not included in the list as they differ from office uses in peaking characteristics and in effect on peak-hour traffic or transit and on maximum production of air pollutants (see 135 Main Final Supplemental EIR, EE81.61, certified November 30, 1982, page 150). This list was updated March 11, 1985, and is available for review at the Office of Environmental Review, 450 McAllister Street.

G-20.13: The Fisherman's Wharf area is one of six major segments within the I-280 TCP study area (refer to Figure III-1 at page III-4 of the DEIR for a graphic presentation of the various segments and their juxtaposition to one another). The discussion referred to in the comment begins at page IV-17 of the DEIR, concludes at page IV-24 and is entitled "Existing Land Use Patterns and Development Trends." Each study area segment (and subsegments, in some cases) were analyzed in an objective and equitable fashion, to underscore the importance of all segments in the study area. While equal importance was



CUMULATIVE DEVELOPMENT NORTH OF MARKET

SCALE 0 400 800 1600 FEET

*Additional information on these projects is on file with the Department of City Planning 450 McAllister St., 5th Floor, and is available for public review.

March, 1984

IV-8

accorded to all study area segments, review of Figures IV-6 and IV-8 in the DEIR (on pages IV-15 and IV-20, respectively) will show that recent development activity in the area has been disproportionately located in the area south of Market Street. On page IV-14 of the DEIR, it is stated that the area south of Market Street has been one of the most rapidly changing areas in San Francisco in the recent past; this appears to be the case for the foreseeable future as well. Thus, while no intention was made to emphasize one study area over another, the discussion was intended to describe existing land use patterns and identify development trends in the study area. That development activity in the area south of Market Street is more intensive than that in the Fisherman's Wharf area, and that discussion devoted to describing that activity is perhaps more detailed than the discussion of Fisherman's Wharf area activity should not be construed as inattention or relative unimportance accorded to the Fisherman's Wharf area.

Comments noted that the Fisherman's Wharf area is a major tourist destination. Additional information on Fisherman's Wharf and its history can be found on page IV-22.

G-20.14: Comment noted. Please see Response to Comment G-20.4.

G-20.15: Comment noted. Pedestrian activities in the Fisherman's Wharf area were discussed in the DEIR (see Sec. V.C.3, Pedestrian Circulation). The Jefferson Street Transit/Pedestrian mall is proposed to mitigate pedestrian congestion in the area.

G-20.16: The photos were taken during late morning, early afternoon, or late afternoon on May 15, 1981. They are included in the urban design setting section to illustrate the existing urban design conditions in the areas shown. They are not intended to show the level of activities during peak or off-peak periods.

G-20.17: The sentence describes the roadway setting in the Fisherman's Wharf area. It does not imply it is "good" or "bad".

G-20.18: Section IV.B.1, Urban Economy, in the DEIR describes all facets of existing economic activity in the corridor -- Fisherman's Wharf, downtown offices and industrial uses south of Market Street. The section discussing general development trends emphasizes office growth because that has been the dominant economic force in the corridor in recent years, although the fisheries industry is considered a permanent, but distinct, sector of the City's economy. Page IV-23 discusses the Fisherman's Wharf Action Plan, which proposes to preserve the local fishing industry.

G-20.19: Comment noted. The vehicle volumes shown for the Bay Bridge is not demand, but the observed traffic volumes relative to capacity. Actual demand could be more than the bridge can accommodate. The 117% figure for BART indicates that trains were carrying more standees during the peak period than that used for capacity calculations.

G-20.20: Table IV-11 (pages IV-66 and IV-67) shows the operating characteristics of existing transit services, as part of the descriptions of the "Environmental Setting".

G-20.21: Employment growth and housing development are closely related. Housing shortage plays an important role in limiting growth potentials in downtown. The projected downtown employment growth reflects certain assumptions about the net increases in housing in the City. If the projected increases in housing were not realized, growth in downtown employment may not reach the projected level due to housing shortages. Conversely, the Downtown Plan provides an effective means to monitor downtown growth and can be used to control the level of downtown growth in relation to actual increases in housing and other city services.

G-20.22: Transit agency five-year plans are an expression of priorities for funding improvements and to some extent are a necessary prerequisite for specific improvements to be considered for state or federal funding. It is possible that some of the improvements planned by the transit agencies will not be completed within a five-year planning horizon due to funding constraints. However, it is important to note that Table IV-12 in the DEIR compares year

2000 transit demand with projected 1987 capacity. Many of the proposals included in the five-year plans have advanced to construction or contract obligation phases. It is likely that most of the five-year plan improvements will be in place by the year 2000.

G-20.23: Comment noted. Existing and projected congestions in the regional highway systems would undoubtedly impact truck traffic to San Francisco. Mitigations or solutions to this problem require a regional approach and cannot be fully addressed in this DEIR.

G-20.24: Comments acknowledged.

G-20.25: The Jefferson Street Transit/Pedestrian mall does not increase or decrease the size of developable land in Fisherman's Wharf area.

G-20.26: Comment noted. The impacts on transit and auto access in the Fisherman's Wharf area were discussed in Sec. V.C.1, Sec. V.C.2, and other appropriate sections of the DEIR.

G-20.27: Within the Fisherman's Wharf segment of the study area, there is no freeway stub similar to the I-280 stub in the China Basin area that, if removed, would yield a net increase in developable land equivalent to the amount that would result if the I-280 stub were, in fact, removed. Thus, it is difficult to compare the impact of changes in developable land totals in the China Basin and Fisherman's Wharf areas resulting from transportation projects.

The traffic impacts associated with Alternatives IV and IV-A which appear in graphic form on pages V-58-59, respectively, of the DEIR (and not page V-60 as stated in the comment), do occur mainly in the area south of Market Street near the Bay Bridge. In designing the work program for the DEIR analysis of traffic impacts, emphasis was placed on the area near the Bay Bridge, which would experience the greatest impact if the Embarcadero Freeway were removed. Once specific projects are identified for possible implementation in the Fisherman's Wharf area, specific impacts could be identified and appropriate mitigation measures developed.

Discussion of impacts on the northeastern waterfront included on page V-69 is for purposes of comparison with other alternatives and does not imply that freeway changes south of Market would have major impacts in the northeastern waterfront.

G-20.28: The I-280 connection with the waterfront is improved in all the alternatives by the various treatments given to the I-280 touch-down ramps, including a direct connection with the reconstructed Embarcadero surface roadway via the King/Berry Street corridor.

G-20.29: Queuing does not necessarily indicate the presence of an idling vehicle queue. It describes the state of traffic flow. Under queuing conditions traffic still moves but at slower speeds and movement of individual vehicles in the queue is severely restricted. The charts on pages V-58 and V-59, for alternatives IV and IVA, indicate that travel speed on the Embarcadero surface roadway will be slower south of Broadway than north of Broadway.

G-20.30: The comment is correct that the alternatives would result in higher costs for goods movement in parts of the corridor due to reduced access or greater volumes of traffic. The specific costs will vary depending on the specific routes and frequency of deliveries used by each carrier and cannot be estimated from the level of analysis appropriate to the DEIR. These costs must also be weighted against certain other economic benefits also not quantified in the DEIR, such as increased long-term patronage of businesses in the corridor due to an overall improvement in the transportation system.

G-20.31: Comment noted. Should they be selected for implementation, the design of the Embarcadero surface roadway and other ramp and street modifications in the study area will incorporate standards and requirements for all users, including visitors and commercial vehicles.

G-20.32: The map on page III-39 is revised to show Embarcadero roadway ending at Powell. The Jefferson Street mall is proposed as a mitigation measure to existing traffic and pedestrian congestion in the Fisherman's Wharf area. Since it is not a proposal for a new development or redevelopment project, a

full economic analysis of the mall is not within the scope of the I-280 study. However, evidence from elsewhere is inconclusive that malls in and of themselves are likely to spur economic growth.

G-20.33: Access for local traffic and delivery services in the Fisherman's Wharf area is preserved in all the alternatives, including the Jefferson Street mall proposal. Please also see Response to Comment G-7.21 by Standard Fisheries Corporation on access. As stated, should the proposed projects for the Fisherman's Wharf area be selected for implementation, detailed access and circulation plans will be developed and specific mitigations to loss of parking will be worked out with the direct participation of local residents and businesses in the design process.

G-20.34: The proposal is to close Columbus Avenue between Leavenworth and Beach Streets in all the alternatives except Alternative I (the do-nothing alternative). The intent was to reduce traffic conflicts now existing in that area. The area is not analyzed in the I-280 study as an affected parkland resource. Please see Sec. VI.C for identification and inclusion of parkland resources in the study.

AMERICAN INSTITUTE OF ARCHITECTS
SAN FRANCISCO CHAPTER

790 MARKET STREET, SAN FRANCISCO, CALIFORNIA 94102 415/362-7397

AIA POLICY STATEMENT

I-280 Transfer Concept Program
Environmental Impact Report (Draft)

1 The AIA has reviewed the urban design evaluations contained within the Draft EIR and stongly recommends the removal of the Embarcadero Freeway and the reconstruction of the Embarcadero Surface Roadway.

In our review of the alternatives presented, we have identified an alternative which has not been included within the Draft EIR and which we feel deserves consideration.

This alternative deals with the removal of the Embarcadero Freeway and the construction of the Embarcadero Surface Roadway, specifically as it passes in front of the Ferry Building. While the removal of the Embarcadero Freeway as proposed in Alternatives III - VA "would create new views to the waterfront", we do not feel that the alternatives go far enough in establishing the high level of urban design character which is approriate for one of the most important waterfront sites in the City: the site where Market Street, the major east/west circulation axis meets the Ferry Building, the most important building on the Northeast waterfront.

2 It is our opinion that the Embarcadero Surface Roadway should be depressed in front of the Ferry Building and that a major pedestrian plaza be constructed. This alternative would vastly improve the public access as well as the visual linkage to the waterfront. As a grand civic plaza, it would cater to the growing demand for public open space in that area as well as serving as the important physical transition from the Market Street corridor to the waterfront. (It should be mentioned that the idea of a major plaza at the foot of Market Street is not an original concept, but was first suggested by Willis Polk in 1897.)

(will provide)

We ~~are~~ enclosing preliminary sketches of a basic plaza scheme at the foot of Market Street. We would like to emphasize that there are several design options available for implementing this concept. Just as various alternatives have been suggested for other components within the transportation package, we feel that options should be evaluated for the treatment of the Embarcadero Surface Roadway. The Market Street/Ferry Building site is of such importance that due consideration must be given to solving the pedestrian/vehicular conflict in a sensitive way.

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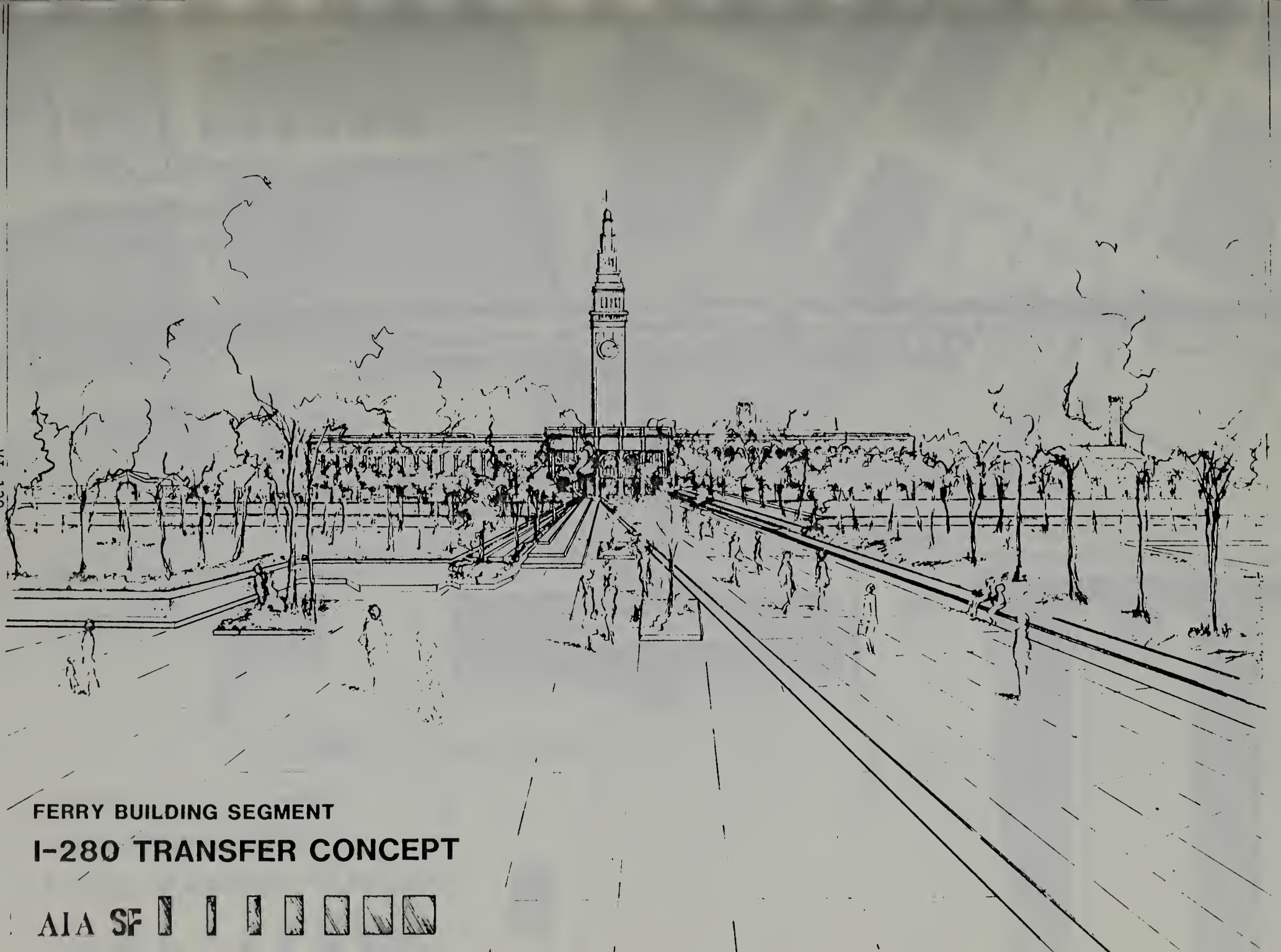
It is recognized that the concept of a depressed roadway and major public plaza will have cost implications and while it is not within our scope to address in detail the funding requirements for our proposal, the following potential sources for funding have been identified:

3

A. Resurfacing of the Justice Herman Plaza and adjacent areas will be included in the construction of the Muni-Metro turnaround loop, should that alternative be selected.

B. Private sector cost sharing may be available with the establishment of development assessment districts in the area, and with intercept parking facilities.

C. Funds associated with new development opportunities on sites made available by the removal of the Embarcadero Freeway may be available.



VT-139

FERRY BUILDING SEGMENT

I-280 TRANSFER CONCEPT

AIA SF

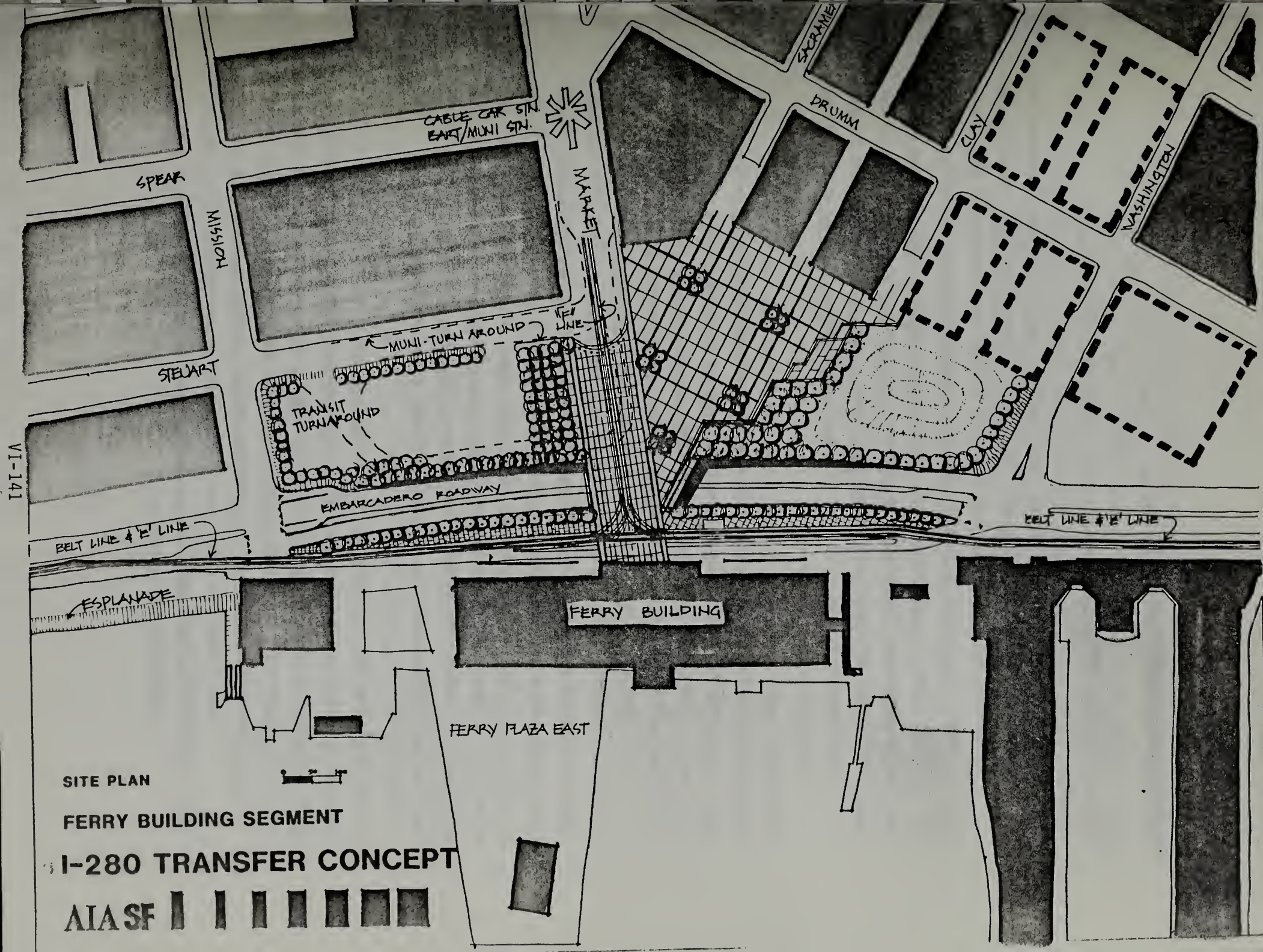


SECTION/ELEVATION

FERRY BUILDING SEGMENT

I-280 TRANSFER CONCEPT

AIA SF



SITE PLAN

FERRY BUILDING SEGMENT

I-280 TRANSFER CONCEPT

AIA SF

RESPONSE TO COMMENT LETTER G-21.

G-21.1: Comment noted.

G-21.2: A depressed roadway/overhead plaza concept, such as the one illustrated by A1A, was not evaluated in the I-280 study. Rather, the study considered a depressed roadway design only as one of several design variations that would improve pedestrian access in the Ferry Building area in Alternative IV-A. Within this limited context, the study team reviewed a 1974 Caltrans design for a depressed Embarcadero road between Mission and Washington Streets and compared this design with other pedestrian access options (pedestrian bridge, underground walkway and signalized at-grade crossing). The major findings of this review are as follows:

- In the Embarcadero Freeway removal alternatives, a minimum of 110 feet right-of-way would be required to accommodate the roadway and transit elements of the Embarcadero surface road in the Ferry Building segment. Should the roadway be depressed, additional right-of-way would be required for shoulders and structures on both sides of the undercrossing. This would place the undercrossing about 40 to 50 feet within the space that the Muni Metro underground turnaround loop would occupy. Avoiding this conflict would place the undercrossing 40 to 50 feet closer to the Ferry Building site. This would intrude into the Ferry Building site or place it right next to the edge of the property line for the Ferry Building development. Also, the undercrossing would make the E-Line/F-Line interface difficult, if not impossible.

- The Belt line track cannot follow a grade steeper than 2%. Accommodating the Belt line within the depressed roadway would significantly increase the length of the depressed segment and cause insurmountable access problems both north and south of Market Street. Alternatively, the Belt line could be placed at-grade. However, it would place the tracks directly at the front doors of the Ferry Building. It would also conflict with the truck service/passenger drop-off/Muni bus stop being proposed by the developers.

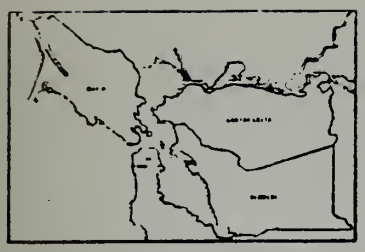
- The width of the undercrossing could be reduced by placing the E-Line at-grade. Two alternative locations are possible. One is to place the tracks on the Ferry Building side, which would mean intrusion into properties and the proposed pedestrian promenade. The other is to place the E-Line tracks along the land side of the Embarcadero roadway. Locating the E-Line along the land side may result in a possible 4(f) violation since they may have to be place in parkland.

- Another problem that the depressed roadway would present is that vehicle access to the Ferry Building area would be totally cut off. To alleviate this problem a frontage road would have to be constructed between Mission and Washington Streets, which would require about 20 feet of additional width.

- Caltrans estimated that the depressed roadway between Mission and Washington Streets would cost $10 million in 1974. The current cost of such a design is estimated well over $20 million. In addition, a major sewer interception line under the Embarcadero roadway may have to be relocated, whicn would add approximately $250,000 to the cost of the undercrossing.

The study findings listed above are the results of a limited investigation; they do not represent a full evaluation of the plaza concept. Nevertheless, they highlight the main issues associated with the concept and thus provide a framework for more detailed studies of this concept. The plaza concept will be more expensive to implement than any of the at-grade options proposed in the alternatives, but it will significantly enhance pedestrian access and the urban design character of the Ferry Building area, and may further mitigate the traffic impact of the Embarcadero Freeway removal. It is likely that some of the constraints in accommodating the various transit and roadway elements can be overcome with careful planning and alternative designs. These opportunities can be fully investigated during project design should the Embarcadero surface road reconstruction be selected for implementation.

G-21.3: The potential funding sources for a depressed roadway as identified by AIA , are noted.



SAN FRANCISCO
BAY CHAPTER
SIERRA CLUB

6014 COLLEGE AVENUE / OAKLAND, CALIFORNIA 94618 / (415) 658-7470

I-280 Transfer Draft EIR
Caltrans
P.O. Box 7310
San Francisco, Ca. 94120

Attn. William Chastain

Dear Sirs:

1 Regarding the various project elements in the Interstate 280 Transfer Draft EIR, the San Francisco Bay Chapter of the Sierra Club is on record as supporting removal of the Embarcadero Freeway, extension of Muni Metro from the Embarcadero Station to the Mission Bay area and extension of Peninsula trains from their present terminal at 4th and Townsend Sts. into Downtown San Francisco. However this last endorsement is contingent upon the train extension being underground and electrified. Two of the three Downtown extension alternatives in the I-280 study place trains above ground and all three use diesel locomotives rather than electric. Furthermore, the EIR ignores any special smoke, noise or health impacts that a diesel extension probably entails.

2

3 The Sierra Club strongly endorses a mix of projects designed to make maximum use of public transportation resources and deemphasize auto use. Preserving the pedestrian environment and encouraging use of environmentally sound transportation modes makes good sense anywhere. But it is particularly important in emerging areas adjacent to Downtown where we have a chance to plan growth rather than be victimized by it.

4 The vitality of the northeastern waterfront is also dependent on the health of the maritime industry. Therefore, reconstruction of the Embarcadero roadway should allow for the needs of freight traffic by truck.

John HOLTZCLAW
San Francisco

RESPONSE TO COMMENT LETTER G-22.

G-22.1: Comment noted.

G-22.2: The PCS extension proposed in Alternative VA will be underground. The at-grade option included in Alternatives V and VI would enter a subway north of Bryant Street. Noise and safety impacts of the at-grade segment can be mitigated with sound walls. Electrification is in the long-range plan for the PCS line. In the interim, the impacts of diesel operation will be mitigated with new equipment and careful facility design. Engineering studies will be undertaken at the time the project is designed in detail to plan an adequate ventilation system to provide for the comfort and safety of train passengers and station users. The ventilation system exhaust vent will be designed to result in sufficient dilution so that ambient air quality standards are not violated in its vicinity. As a result, no significant air quality impacts would be predicted to result from the operation of diesel trains in the tunnel.

G-22.3: Comment noted.

G-22.4: The reconstruction of the Embarcadero surface roadway allows for the needs of freight traffic by truck.

VII COMMENTS AND RESPONSES - INDIVIDUALS (I)

Caltrans **MEETING COMMENTS** (Please Print) California Department of Transportation

Name CHARLES VERGELLI Date NOV. 15, 1984

Address 210 JACKSON ST. #403, SAN FRANCISCO, CA. 94115

Representing ARTICLE. (Business, Organization, Association, etc.)

I wish to speak . . . . . ( ) *(please check)*

I would like to have the following question(s) answered:

I would like to make the following statement for the record: RE I-280 EIR — THE REMOVAL OF THE EMBARCADERO FREEWAY AND DEVELOPMENT OF RAIL TRANSIT FROM ET. MASON TO THE CAL TRAIN DEPOT IS DESIREABLE TO ENHANCE THE WATER-FRONT AND IMPROVE PUBLIC TRANSIT IN THE AREA. I FIND ALTERNATIVE IV-A THE MOST DESIREABLE.

1

Form 4AD221 (Rev. 2/84)

RESPONSE TO COMMENT CARD I-1.

I-1.1: The Commentator's preference for Alternative IVA is noted.

Caltrans

MEETING COMMENTS
(Please Print)

California
Department of Transportation

Name Peter Albert Date Nov. 15

Address 614 Cole Street SF 94117

Representing _____
(Business, Organization, Association, etc.)

I wish to speak . . . . . (✓ *(please check)*

I would like to have the following question(s) answered: _____

I would like to make the following statement for the record: The Pedestrian Environment is the characteristic environment of NE San Francisco. and preserving and enhancing that environment are key issues. I280 and the Embarcadero extensions would continue to intrude on this delicate quality environment, whereas their removals are advancements in aesthetics and livability. Meet traffic congestion →

1

Form 4AD221 (Rev. 2/84)

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caused by these removals with stepped-up transit service - local and Peninsula - as transit also serves to enhance concentrated pedestrian activity. I see Alt. 4 (IV.) as the strongest.

RESPONSE TO COMMENT CARD I-2.

I-2.1: Comments on preserving and enhancing the pedestrian environment are noted. The Commentator's preference for Alternative IV is noted.

Caltrans

MEETING COMMENTS
(Please Print)

California
Department of Transportation

Name DAVID HAMILTON Date 11-17-84

Address 293 CONNECTICUT ST SF 94107

Representing
(Business, Organization, Association, etc.)

I wish to speak . . . . . ( ) *(please check)*

I would like to have the following question(s) answered: ARE WE, THE PUBLIC, SUPPOSE TO "SELECT" AN ALTERNATIVE?; WHO CHOOSES THE ALTERNATIVE? WHAT IS THE NEXT STEP IN THIS PROCESS?

1

I would like to make the following statement for the record: I PREFER ALTERNATIVE II; I THINK TEARING DOWN THE EMB. FREEWAY IS ABSURD, ALTHOUGH IT LOOKS AWFUL. HOWEVER, WHEN DRIVING ON EITHER THE UPPER OR LOWER DECK IT IS PERHAPS ~~ONE~~ THE MOST DRAMATIC AND SCENIC FREEWAY DRIVES IN THE WORLD; WHAT WITH THE FINANCIAL DISTR. TOWERS ON ONE SIDE AND THE BAY ON THE OTHER, ON A NICE CLEAR SUMMER NIGHT . . .

2

Form 4AD221 (Rev. 2/84)

RESPONSE TO COMMENT CARD I-3.

I-3.1: The selection of a locally preferred alternative will be a joint effort of the State (through Caltrans), the Metropolitan Transporation Commission, and the City and County of San Francisco. Projects selected for implementation will be subject to further design development, implementation planning and project-level environmental clearance. The public will have an opportunity to participate in the project design and environmental clearance process.

I-3.2: The Commentator's preference for Alternative II is noted.

Caltrans **MEETING COMMENTS** (Please Print) California Department of Transportation

Name Jack C. Williams Date NOV. 24, 1984

Address 1425 Oregon Street, Mgrs Apt., Berkeley, CA 94702

Representing Myself (Business, Organization, Association, etc.)

I wish to speak . . . . . ( ) *(please check)*

I would like to have the following question(s) answered:

I would like to make the following statement for the record: San Francisco should have an open unobstructed waterfront boulevard, like it was before 1958. The Embarcadero freeway should be torn down to improve the appearance of the city, increase open space, increase business, and enhance the pleasantness and well-being.

1

Form 4AD221 (Rev. 2/84)

RESPONSE TO COMMENT CARD I-4.

I-4.1: The Commentator's support for Embarcadero Freeway removal is noted.

Russell D. Corning
41 Chestnut Avenue
San Rafael, CA 94901

November 26, 1984

COMMENTS - I-280 Draft EIR

This Draft EIR is woefully deficient in a most critical area. The subject of safety is not discussed, not addressed, nor is it even mentioned. In fact, the subject of safety is so conspicuous by its absence that it causes the reader to wonder about the root causes of its omission.

1 When I now raise the subject of safety, I am of course referring to comparative roadway safety between the Embarcadero Freeway on the one hand versus each of the proposed replacement surface roadways on the other hand.

The conspicuousness of safety's absence surfaces from three different sources in the Draft EIR. First, I'll mention the overview. The document is replete with hundreds of comparisons, projections, trade-offs, etc., between each of the alternatives. The reader plods through hundreds of pages feeling safety comparisons are just around the corner. They are not. None of the excellent graphs and charts, similar to those published by Caltrans in its annual report entitled "Accident Data on California State Highways," appeared in the text.

2 Secondly, on pages II, 14 - 17, we find Table II-1. It contains 9 Goals and 33 Objectives for the I-280 Transfer Concept Program, a combined total of 42. The priority of roadway safety is so low that it is not even included in the 42 Goals and Objectives.

Thirdly, I direct your attention to page II-14, Table II-1, the first Goal, the third Objective. This Objective is to "Provide facilities for the safe and efficient movement of GOODS and COMMODITIES" (Emphasis mine). It is revealing to learn that the I-280 Transfer Concept Program is truly concerned about the safe and efficient movement of goods and commodities but not at all concerned about the safe and efficient movement of people.

3 I ask that the subject of comparative roadway safety be fully addressed in the Final EIR. Particularly, I ask for the inclusion of tables and graphs projecting comparative roadway safety between the Embarcadero Freeway on the one hand and each of the replacement surface roadways on the other hand. Specifically, I ask that you publish two tables comparing projected accidents -- Total Per MVM and Fatal + Injury Per MVM, and a third table comparing projected Fatalities Per 100 MVM.

Thank you for your consideration to this important subject.

Russell D. Corning
11-26-84

RESPONSE TO COMMENT LETTER I-5.

I-5.1: Comments noted. The safety issue was addressed in Sec. V.C. and other sections of the DEIR, in terms of transit/vehicle/pedestrian conflicts. The concept design proposed for the reconstruction of the Embarcadero surface roadway and the proposed TSM improvements reflect traffic safety considerations for all users.

I-5.2: The comment is correct that the "safe and efficient movement of people" was not explicitly spelled out in the transportation goals and objectives of the I-280 TCP alternatives. The intent has been adequately covered in the transportation service goal statement and other objectives listed.

I-5.3: Detailed accident analysis for individual projects was not performed due to the nature of a system-level study. However, the important roadway safety comparative measures have been projected and presented in the DEIR (Table I-2, D. Annual Vehicle Miles of Travel). The annual VMT projections shown adequately compare the roadway safety among the alternatives. More detailed accident analysis. as requested by the Commentator, would not add to the adequacy or accuracy of the information already provided in the DEIR.

November 26, 1984

Mr. William Chastain
Caltrans
P.O. Box 7310
San Francisco, CA 94120

Dear Sir:

Thank you very much for sending me the Draft E.I.R. I-280 Transfer Concept Program. I have studied this report extensively and have included my comments. I look forward to reading the final document and anxiously await the impending decision.

Sincerely,

John Donahue

John Donahue

COMMENTS ON THE I-280 TRANSFER CONCEPT DRAFT E.I.R.

After studying the the I-280 Transfer Concept Program draft environmental impact report, I support alternative # 2. I also endorse some modifications of this alternative. This alternative is the best for many reasons. These reasons include social, financial and environmental aspects which are discussed in the draft report.

The fact that the project can be supported completely by this transfer of funds is an obvious benefit. The construction required has both the lowest initial cost and the least amount of negative impact of all the alternatives found to have positive value. It will result in the lowest amount of revenue loss through taxes and fees of all of the alternatives. The draft document notes that alternative two is amoung the most cost effective. The operating costs are the least expensive and are totally supportable while the other alternatives will require operating at a defecit and searching for outside funding. 1

A central segment of alternative two is the retention of the Embarcadero freeway. The maintenance of this roadway is essential at this time. All of the alternatives requiring the removal of the Embarcadero freeway result in several negative impacts which are not acceptable. The increase in traffic on the surface roadway will be devestating to the movement in the transportation corridor. The air quality will fall below acceptable levels because of the increase in carbon monoxide concentrations. The construction of the six lane surface roadway proposed to replace the Embarcadero freeway will eliminate any benefits gained by this action.

The noise level will rise significantly in the area as a result of all of the proposals except alternative two. The benefits of retaining the Embarcadero freeway and upgrading the surface roadway below it are numerous. The draft document states that alternative two creates the best improvement by maintaining the surface roadway as a four lane road throughout the area. The E.I.R. goes on to state that alternative two causes the least barrier effect because King street would remain narrow and the retention of the freeway does not produce the added traffic on the surface road that its removal would cause.

Another positive aspect of alternative two is that it is not dependent on railways for public transportation. It has been demonstrated effectively in the past how easilly a rail system can be disrupted by seismic events in San Francisco. The Embarcadero corridor is especially sensitive to potential earthquake damage. It is therefore not wise to invest in dependence on systems that can be so easilly disrupted.

2 I would also like to suggest that traffic bound for points north and south of San Francisco be rerouted on the east side of the bay. Since I-280 will not provide the corridor between the Bay bridge and the Golden Gate bridge it was intended for, another corridor is required for interstate traffic. It is more sensible for traffic to cross the bay on the Richmond bridge and never enter San Francisco at all.

In addition to the treatments designated in alternative two, the Hyde street to Fort Mason cable car should be reinstated. It will provide both transportation and a tourist attraction for the area. It will not be the only source of

3 public transportation in the area and therefore the problems intrinsic with its implementation are not critical. This suggestion is consistent with the Golden Gate N.R.A. Master Plan.

4 It is commendable that all of the alternatives seek to increase the use of public transportation and discourage the use of private automobiles. However, the key to increasing the use of mass transit is availability. Mass transit must be available on a twenty four hour basis in order to be a viable alternative in a large city. This should be dealt with more fully in the final document and at the very least an increase in the number of usage hours is called for. The intercept parking facet that is listed in the various alternatives is an important step, but more than one intercept parking area will be required. At the very least, there should be one parking area at each bridge.

5 An increase in the pedestrian and bicycle ridership in the corridor is called for as a goal. Cyclists will require a defined bicycle path and it should be seperated by a physical barrier if at all possible. Pedestrians will require overpasses after this project is completed regardless of which alternative is chosen. The overpasses should be placed strategically and include some of the maritime atmosphere in their design. Buses in the area should be designed to assist the physically handicapped.

I should like to see some of these suggestions included in the treatment of alternative two. Alternative two allows more time to consider the ramifications of removing the Embarcadero freeway. Alternative two is the optimal selection because it requires the least financing, causes the fewest problems, and allows time to build the public transportation system required to replace the Embarcadero freeway if it is eventually removed.

RESPONSE TO COMMENT LETTER I-6.

I-6.1: The Commentator's analysis and support for Alternative II are noted.

I-6.2: Suggestions noted. The suggestion has significant regional implications and should be addressed in a separate study which addresses regional transportation policies and issues.

I-6.3: Comment noted. Cable car extension is not an element of the I-280 TCP alternatives.

I-6.4: Comments noted. More detailed operations plans will be developed for selected transit improvements which will address the service hours, frequencies, and other operating requirements of selected projects. Similarly, should the intercept parking concept be selected, more detailed studies will be required to refine the number and location of needed intercept parking facilities.

I-6.5: Comments noted. Please also see Comment Letter G-17 for different opinion on bicyclists needs.

LAW OFFICES OF
BACCI AND BACCI
5844 GEARY BOULEVARD
SAN FRANCISCO, CALIFORNIA 94121
TELEPHONE 668-1772

LEONARDO S. BACCI
ROBERT R. BACCI
TERI FOWLER

November 28, 1984

Russell D. Sayre
Project Manager
P.O. Box 7310
San Francisco, California 94120-7310

RE: Comments, Draft EIR
I-280 Transfer Concept Program

Dear Mr. Sayre:

The following comments are directed to alternatives that were not studied, and the fact that they were not even considered in the long list of alternatives is most surprising.

1 First of all, the No Project alternative is not really the baseline for what should be considered. This is an EIR to transfer funds from a proposed freeway extension to other purposes and uses. In reality, the baseline alternative should have been using the funds to complete the original freeway as planned. While this proposal was not within the plans of the City and County of San Francisco, it does reflect what was originally intended and also provides the optimum, or at least presumably optimum, solution to the traffic and automobile conflicts.

2 The second matter not considered within these proposals to eliminate the Embarcadero Freeway as it presently is, is a study of alternatives involving a new depressed freeway/roadway. Over the years this had been discussed on many occasions in terms of removing the Embarcadero Freeway and, while considered to be very expensive, has never been actually studied for an EIR. I also realize that BART construction and city sewer construction may have impacted negatively on the ability of executing this plan. Failure, however, to have discussed it at all precludes the consideration of these matters.

Finally, with reference to the PCS extension options, why are the options studied only two, namely complete subway

3 treatment vs. totally surface treatment. A third alternative would appear to be a depressed PCS right-of-way, particularly in accomplishing the crossings of Third and Fourth Streets. This treatment would presumably be physically possible along King Street, be less costly than total subway, and eliminate the barrier of sound walls, and presumably also it could be covered over at a later date should additional funding become available to make it subway.

Very truly yours,

ROBERT R. BACCI

RRB:bd

RESPONSE TO COMMENT LETTER I-7.

I-7.1: The deletion of the originally planned I-280/Embarcadero Freeway connection from the Interstate Highway system is an accomplished fact by State and City actions (please see explanations in the DEIR and Response to Comment G-5.1). The DEIR addresses alternatives for other transportation improvements to substitute the withdrawn segment. The logical basis for the study of substitute alternatives is the "do-nothing" alternative.

I-7.2: Please see Responses to Comment Letter G-21 for discussions on the depressed Embarcadero roadway concept.

I-7.3: As for all elements of the I-280 Transfer Concept Program, the PCS extension options described in the DEIR are concepts rather than detailed project designs. The DEIR provides information on the range of impacts associated with each concept for use in the selection of a preferred concept. There are design options and variations associated with each concept. A depressed PCS alignment referred to in the comment is one such design option or variation of the subway concept. If selected for further development a concept will be subject to detailed design which will include refinements in alignments or other aspects of the project based on project-level impact, mitigation, and funding availability considerations.

1440 Broadway #307
San Francisco CA 94109
November 28, 1984

Mr. W.B. Chastain
Caltrans
P.O. Box 7310
San Francisco CA 94120-7310

Dear Mr. Chastain:

I write as a private citizen concerning the Interstate 280 Transfer Program draft Environmental Impact Statement.

1 Having reviewed the document thoroughly, I am satsified that it provides adequate review of the major alternatives available for implementation.

Further, I would like to take this opportunity to express my personal views on aspects of this program.

EMBARCADERO FREEWAY

As an automobile owner living near the west end of the Broadway Tunnel, I have occasion to use the Embarcadero Freeway at least four times a week. My reading of the draft EIR indicates to me that removal of the freeway, beyond the Main-Beale ramps, will lengthen each journey I take on this route.

Nonethless, I strongly support removal of this portion of the freeway, as long as the following mitigation measures are undertaken:

- Construction of on- and off-ramps to The Embarcadero as in Alternative IV-A.
- Provision, on the Embarcadero surface roadway, for at least three lanes in each direction between Broadway and Howard Streets.
- Signalization and other traffic flow improvements to maintain smooth traffic flow on the surface roadway.
- Construction of the "E" rail line, in a dedicated right-of-way, from the Ferry Building area north to Fisherman's Wharf.

Further, I would hope the following additional mitigation measures could be considered:

- Provision for a fourth southbound lane (which could be a parking lane with appropriate tow-away restrictions) during the PM peak between Broadway and Howard.

- Establishment of a second westbound lane on Bryant Street between the Embarcadero and the Sterling Street Bay Bridge ramp. The lane would serve general traffic and would augment the single bus-carpool lane now on this alignment. Such a lane, running along a street with few driveways or wayside businesses, could effectively replace some of the "queueing capacity" now provided by the Embarcadero Freeway elevated structure in the PM peak. Use of metering lights on this lane would guarantee continued preference for high occupancy vehicles using this ramp.

- Addition of a third southbound lane on The Embarcadero and the final accepted connecting street (Townsend or King) between Howard and the I-280 on-ramp in the China Basin area, plus signage designed to divert Peninsula-bound PM peak commuters from the Howard/Embarcadero and Beale/Mission on-ramps to the Embarcadero Roadway. Such a measure should more evenly spread the commuter load.

- Consideration of a street reconfiguration that would more smoothly move traffic from Clay Street eastbound onto the Embarcadero surface roadway. None of the current proposals seem to provide an adequate replacement for the Clay Street on-ramp to the elevated freeway. 2

Even though I would personally be inconvenienced by it, the removal of the Embarcadero Freeway has my strong support, because, as a fourth-generation San Franciscan, I feel that we must re-establish the traditional visual link between our Waterfront and Downtown. The beauty of the Ferry Building, one of our city's most historic structures, has been lost to a full generation of San Franciscans. The last remaining shred of our downtown waterfront's commercial heritage, the East Street Row, is unseen by most San Franciscans, all because of construction of this unfinished structure, which does not serve the purpose for which it was built; i.e., a direct freeway connection between the Bay and Golden Gate Bridges.

Though I understand that in the afternoon peak period, removal of the freeway would lead to crowding of the Embarcadero surface roadway, and that the surface roadway would be busier than currently at almost any time of the day, I still believe the additional traffic on the surface is preferable to the continued presence of this barrier

which keeps us from the presence of our past. It is time we fixed that.

MUNI METRO EXTENSION

In my view, this is a key component of any system of alternative transportation measures designed for the corridor.

Regardless of possible extension of the Caltrans Peninsula train service to the vicinity of Transbay Terminal, construction of this line is an important investment in San Francisco's future.

Projections show extensive residential construction planned for the South Beach and Mission Bay areas in the coming decade. Beyond this, it is reasonable to presume that further extensive residential development will take place southward along the Third Street corridor, replacing some of the current marginal industrial uses.

Between this developing area and the Financial District, the Embarcadero corridor provides the only realistic opportunity for an exclusive, enforceable transit right-of- way with limited stops and hence faster running times than currently possible along alternative routes (such as the Third/Fourth couplet downtown, which require operation in mixed traffic. For this reason, I fully support the concept of the Muni Metro Extension, with the proviso that the Steuart Street tracks not rise from subway to grade north of the Howard Street intersection. 3

A track portal on Steuart between Mission and Howard would degrade the aesthetics of the west side of the old East Street Row, only recently fully renovated and returned to productive economic use. Further, and perhaps even more important, tracks crossing Howard Street at grade would present intolerable conflicts with the proposed Howard Street on-ramp to the remaining Embarcadero Freeway structure. Manual traffic control would be required in the PM peak to ensure that queuing automobiles would not block the tracks, stopping heavily-loaded streetcars bound for the Caltrain depot.

E-LINE

North of the Ferry Building, a streetcar line using vintage equipment connecting Fisherman's Wharf and the Aquatic Park/ Fort Mason area with Market Street would clearly be an instant hit with visitors and residents alike. Simple signage at the cable car turntables would divert large numbers of visitors onto this historic trolley system, thus easing the burden on the badly overloaded cable car system, whose carrying capacity cannot be significantly expanded.

The key to achieving maximum ridership on this line, as described above, requires, in my view, through routing of streetcars from the Civic Center area or beyond, down Market Street to the Ferry Building area, then north along The Embarcadero to the Fisherman's Wharf area. Such routing would use portions of Muni's proposed "F" and "E" lines.

It should be pointed out that since the days the "E" line alignment was first proposed, Muni's operating plans have changed, to the point that it is now generally assumed that two lines will operate along the Embarcadero, one on either side of the Ferry Building: the Metro Extension, from the Caltrain terminal to the Ferry Building vicinity, thence under Market in the existing subway, and the "F/E" historic
4 trolley line descibed above.

This proposed operating method should not preclude, however, installation of full double revenue trackage on The Embarcadero connecting the Metro Extension and the "E/F" line tracks. Some alternatives show only a single track connection, designed as a pull-in, pull-out track, not to be used for revenue service.

It is likely in coming years, that traffic demands on The Embarcadero will make some level of through rail service, from the Caltrain station to Fisherman's Wharf, desirable, at least in peak periods. For that reason, and for operating flexibility, full double-track connections should be made.

BELT RAILROAD TRACKAGE

All alternatives in the draft EIR allow for a separate Belt Railroad track south of the Ferry Building area, and combined Belt Railroad and Muni operations north of that point.

It is my understanding that the Port of San Francisco may now be pressing for a separate Belt Railroad track north of
5 the Ferry Building as well. I strongly oppose this.

The most cursory observation of the existing Belt trackage shows virtually no use of the tracks north of the Ferry Building (and very little use south to China Basin, for that matter).

Further, the Northeastern Waterfront Plan does not envision heavy maritime use north of the Ferry Building, nor in any event is there any longer the amount of required support space for such use.

South of the Ferry Building, The Embarcadero right-of-way is sufficiently wide to accomodate the separate Belt Railroad track without impinging on needed traffic lanes, sidewalks, park areas, etc. North of the Ferry Building, this is not the case. Something would have to go to allow an extra track, and the foreseeable volume of rail traffic really doesn't require a separate track.

North of the Ferry Building, shared Belt Railroad trackage with streetcars, restricting train operations to night hours, seems perfectly adequate. Anything beyond that seems clearly a waste of money and right-of-way. Were it not for technical considerations (i.e., the fact that LRV pantographs cannot reach the overhead wire height necessary for joint freight/passenger operation, I would similarly oppose a separate Belt Railway track south of the Ferry Building.

I-280 TOUCHDOWN RAMPS

On this aspect of the Draft EIR, the dynamics of the proposed Mission Bay development and the China Basin baseball stadium will clearly have great impact on the final decisions made.

6 In my view, it is very important for the public agencies involved to be receptive to developers' plans, and to seek agressively developers' funds for as much of the street and highway improvements in this geographic area as possible. This could include removal of the I-280 stub between Sixth and Third, construction of new on- and off-ramps near Sixth, and reconfiguring of surface streets such as King and/or Townsend between Sixth and Third to provide adequate handling capacity for the new I-280 ramps.

SUMMARY

7 It is my belief that a carefully thought-out plan using the Federal resources made available by the I-280 transfer program, augmented by state and local resources as available, can provide enhanced transportation opportunities in this corridor, while restoring San Francisco's traditional visual link to its waterfront in the vicinity of the Ferry Building area. I look forward to monitoring the progress of this project.

Sincerely,

Rick Laubscher

RESPONSE TO COMMENT LETTER I-8.

I-8.1: Comment on the adequacy of the DEIR is noted.

I-8.2: The Commentator's opinion and support for the removal of the Embarcadero Freeway are noted. Suggestions for additional mitigation measures are noted and will be evaluated should the removal of freeway be selected for implementation.

I-8.3: The commentator's analysis and support for the Muni Metro extension in any alternative are noted.

I-8.4: The commentator's suggestions for E-Line/F-Line routing and operations are noted. The possibility of a future connection between Muni Metro line and E/F-Line north of Ferry Building for revenue service was recognized in the I-280 study. The proposed concept design for E-Line does not preclude this possibility.

I-8.5: The commentator's objection to a separate Belt line track north of the Ferry Building is noted. The I-280 TCP alternatives propose to share tracks with E-Line north of the Ferry Building.

I-8.6: The Commentator is correct in stating that the proposed Mission Bay development and the China Basin sports stadium would have great impact on the final decisions on the I-280 touch-down ramps and other highway and transit improvements in that area. The final plans for these two proposed projects may require changes and modifications in the concept designs described in the DEIR. In view of the benefits to the proposed developments, cost sharing with private sectors for proposed transportation improvements in the China Basin area is a valid approach, and has been identified in the DEIR. It is noted that there has been a change in direction in the pursuit of a China Basin sports stadium due to difficulties in securing suitable lands and a lack of financial support from the private sector.

I-8.7: Comment noted.

DAVID KINSEY
35 BELVEDERE ST.
SAN FRANCISCO, 94117

NOVEMBER 29, 1984

DEAR W. B. CHASTAIN,

1 AS A RESIDENT OF THIS CITY I AM VERY CONCERNED WITH THE CAR AND RAIL TRANSPORTATION ASPECTS. I ATTENDED THE PUBLIC HEARING ON THIS NOVEMBER 15. I DO NOT REPRESENT ANY ORGANIZATION, ONLY MYSELF. AFTER HAVING READ THE 7 ALTERNATIVES I FIND VA TO BE MOST FAVORABLE TO RAIL TRANSPORTATION.

2 I WOULD LIKE TO EXPRESS THAT RAIL TRANSPORTATION HAS TO BE THE FIRST PRIORITY IN WORKING ONE OF THESE PLANS. BOT IN WORKING THE RAIL TRANSPORTATION SYSTEM OUT IT HAS TO MAKE SENSE, I.E. IT ALL HAS TO CONNECT; IT HAS TO HAVE A CENTRAL HUB AND ALL OTHER LINES HAVE TO CONNECT WITH THIS CENTRAL HUB. AND THIS CENTRAL HUB SHOULD BE THE TRANSBAY TRANSIT TERMINAL.

SO FAR THIS CITY HAS FAILED TO SHOW ANY SEMBLANCE OF A WELL WORKING, CONNECTING RAIL TRANSPORTATION SYSTEM. WITH THE OUTCOME OF THESE PLANS I SEE A GLIMPSE OF HOPE FOR A TRULY WORKING RAIL SYSTEM. I AM GRATEFUL FOR BEING ABLE TO EXPRESS MYSELF AND THAT YOU WILL CONSIDER WHAT I SAY. I KNOW THE PLANS FOR THE 7 ALTERNATIVES ARE NOT SEALED IN CONCRETE SO IF YOU WOULD CONSIDER SOME ASPECTS OF AN 8TH ALTERNATIVE - ONE I CALL 5B.

- THE ELIMINATION OF THE EXISTING SOUTHERN PACIFIC DEPOT.
- CREATING AN UNDERGROUND RAILROAD STATION AT THE TRANSBAY TRANSIT TERMINAL RE-MAKING IT THE WORKING STATION IT WAS. NOW TO SERVE TRAINS, STREET CARS AND BUSES.
- BUILD THE SUBWAY ENTRANCE FOR THE CALTRAIN TO THE TRANSBAY TERMINAL AT 7TH ST.

3

- THE ELIMINATION OF THE EMBARCADERO FREEWAY FROM BEALE ST. TO BROADWAY. BRING THE CITY BACK TOGETHER. THIS FREEWAY ONLY DISSECTS THE CITY.

- CREATE AN OFF RAMP AT FOLSOM ST. AND AN ON RAMP AT HOWARD ST. IF THIS CAN BE DONE WITHOUT CLOSING ANY STREETS. DO NOT CLOSE ANY STREETS ANYWHERE!

- CREATE THE TRULY GREAT BOULEVARD OF THE CITY - THE EMBARCADERO. LET IT RUN ITS ENTIRE LENGTH FROM JEFFERSON ST. TO BERRY ST. WITH 3 LANES TRAVELING IN ~~BOTH~~ EACH DIRECTION. THE BOULEVARD SHOULD HAVE WIDE SIDEWALKS PLANTED CONTINUOSLY WITH TREES. ALL STREETS THAT CAN SHOULD FEED INTO THE EMBARADERO - EXTEND UNION ST. AND GREEN ST. INTO THE EMBARCADERO. MAKE & WASH-INGTON ST. 2 WAY BETWEEN DRUMM ST. AND THE EMBARCADERO. MAKE POSSIBLE LEFT HAND TURNS FROM EMBARCADERO ONTO ALL STREETS.

- LAY STREET CAR TRACK FROM FORT MASON ALONG JEFFERSON OR BEACH ST. TO THE EMBARCADERO WHERE NOW THE TRACKS WILL BE ON A SLIGHTY RAISED MEDIAN (AS JUDAH ST.) WHERE IT WILL TRAVEL DOWN THE CENTER OF THE EMBARC. ADERO WITH STOPS AT EACH STREET. WHEN IT COMES TO CLAY ST. IT WILL TURN LEFT TO GO IT FRONT OF THE NORTH WING OF THE FERRY BUILDING WHERE IT WILL LOAD AND UNLOAD PASSANGERS FROM THE FERRYES. (ALL FERRIES SHOULD BE DOCKING AT THE TERMINAL NOT ALONGSIDE THE
6 BUILDING AND A CORRIDOR SHOULD BE BUILT FROM THE FRONT DOOR OF THE FERRY BUILDING TO THE TERMINAL.) THE STREET CAR WILL THEN CROSS THE EMBARCADERO PARALLELING A CROSS WALK WHICH WILL BE THE ENTIRE WIDTH OF MARKET ST. FORMING A STRAIGHT LINE FROM MARKET ST. TO THE FRONT DOOR OF THE FERRY BUILDING. THE STREET CAR WILL THEN CROSS THROUGH JUSTIN HERMAN PLAZA, FOLLOW MARKET ST. TO FREEMONT WHERE IT WILL TURN ON A SLIGHTLY RAISED TRACK TO THE TRANSBAY TERMINAL, THEN CONTINUE UP FIRST ST.

AGAIN ON A SLIGHTLY RAISED TRACK AND CONTINUE DOWN MARKET ST. TO CASTRO ST. ADDITIONAL TRACKS WILL BE ADDED ALONG MARKET ST. ~~TO CASTRO ST.~~ FROM DUBOCE ST. TO CASTRO ST. ENABLING THE STREET CAR TO FOLLOW A STRAIGHT CONTINUOS PATH. IT WILL LOOP AROUND USING 17TH ST. AND NOE ST. AND RETURN ITS TRIP TO FORT MASON VIA MARKET ST., TRANSBAY TERMINAL, FERRY BUILDING, EMBARCADERO.

- THERE WILL BE NO DROP OFF PARKING AT THE FERRY BUILDING.

7 - NO SECTIONS OF STREETS WOULD CLOSE

- THERE COULD BE ON & OFF RAMPS FOR INTERSTATE 280 AT THIRD ST.

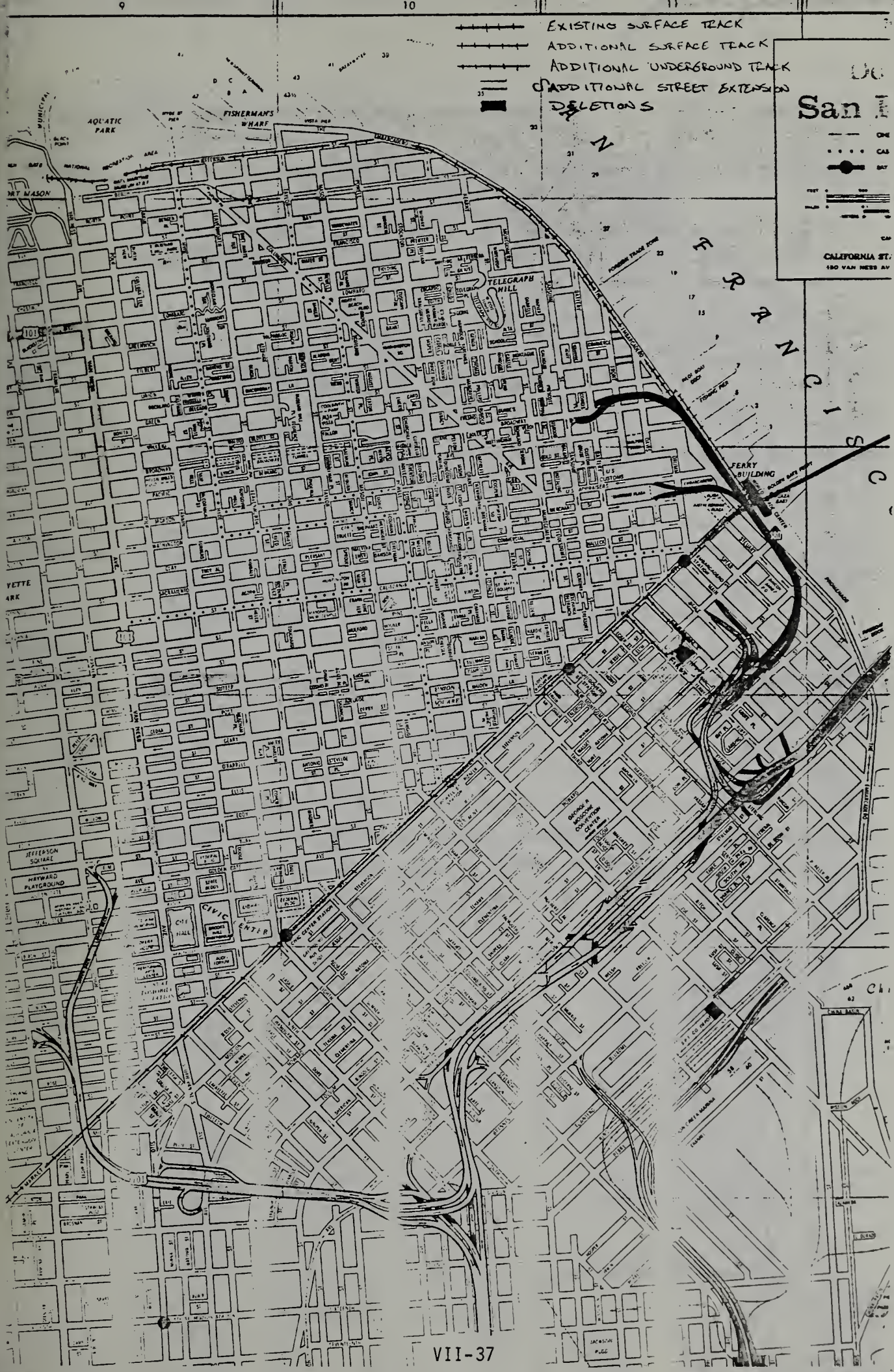
- ~~ELIMINATE STREET CAR TRACKS ON CHURCH ST. BETWEEN DUBOCE ST. AND MARKET ST.~~

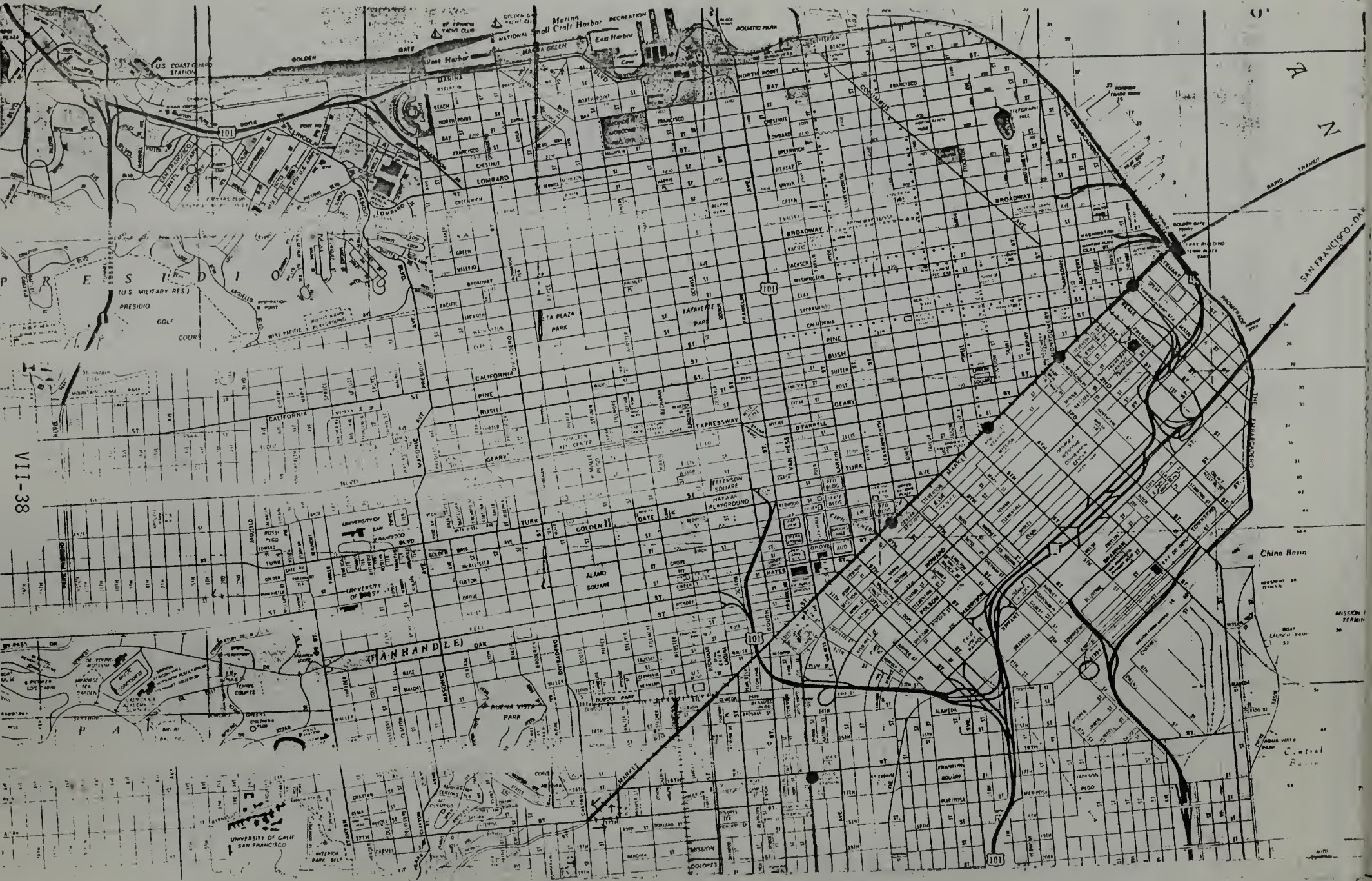
THESE ARE SOME OUTLINES TO A WORKING, CONNECTING TRANSPORTATION SYSTEM. THE KEY TO A SUCCESSFUL WORKING CITY LIES NOT WITH THE AUTOMOBILE BUT WITH VIABLE RAIL TRANSPORTATION.

THANK YOU.

SINCERELY,

David Kinsley


EXISTING SURFACE TRACK
ADDITIONAL SURFACE TRACK
ADDITIONAL UNDERGROUND TRACK
ADDITIONAL STREET EXTENSION
DELETIONS
San
CALIFORNIA ST.
AQUATIC PARK
FISHERMAN'S WHARF
TELEGRAPH HILL
FERRY BUILDING
JEFFERSON SQUARE
HAYWARD PLAYGROUND
CIVIC CENTER
CIVIC CENTER STATION
MOSCONE CONVENTION CENTER
SAN FRANCISCO


PRESIDIO
(US MILITARY RES)
PRESIDIO GOLF COURS
PRESIDIO TERRACE
PRESIDIO HEIGHTS
U.S. COAST GUARD STATION
GOLDEN GATE
West Harbor
Marina Small Craft Harbor
East Harbor
MARINA GREEN
MARINA
NORTH POINT
CHESTNUT
LOMBARD
GREENWICH
BROADWAY
PACIFIC
JACKSON
WASHINGTON
CLAY
SACRAMENTO
CALIFORNIA
PINE
BUSH
SUTTER
POST
GEARY
O'FARRELL
EXPRESSWAY
MARKET
TURK
GOLDEN GATE
HAYES
GROVE
FULTON
McALLISTER
ALAMO SQUARE
JEFFERSON SQUARE
HAYES PLAYGROUND
LAFAYETTE PARK
SUTTA PLAZA PARK
BUENA VISTA PARK
DUBOCE PARK
ALAMEDA
MISSION
HOWARD
FOLSOM
HARRISON
BRYANT
BRANNAN
TOWNSEND
KING
BERRY
FOURTH
FIFTH
SIXTH
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VII-38

RESPONSE TO COMMENT LETTER I-9.

I-9.1: It is noted that the Commentator finds Alternative VA to be most favorable to rail transportation.

I-9.2: Comment noted.

I-9.3: Suggestions for PCS extension and terminal are noted. Please see Response to Comment G-10.4 and I-7.3 for possible refinements in alignment and terminal location during project design.

I-9.4: Suggested treatments for the Embarcadero Freeway removal and new on-and off-ramps are consistent with Alternatives IVA, V and VA.

I-9.5: Suggestions for the Embarcadero surface roadway are noted. The six-lane throughout option was dropped in favor of a more flexible 4 to 6-lane design. Please see Response to Comment G-7.12 for further discussion.

I-9.6: Suggestions for E-Line along the waterfront are consistent with the concept design proposed in the alternatives. E/F-Line alignment along Market Street corridor is the subject of a separate study.

I-9.7: The drop-off/pick-up zone at the Ferry Building is proposed to serve the existing and projected needs. Street closures are proposed to redirect local circulation and minimize traffic conflicts. Each street closure has its own merits. A on- and off-ramp at Third Street for I-280 is not consistent with the connecting street pattern at that location.

MEETING COMMENTS

State of California - Please Print - Department of Transportation

Name P. MARTIN Date 11/30/84

Address 2295 Vallejo St

Representing Self

(Business, Organization, Association, etc.)

I-280

I wish to speak . . . . . [ ] *(please check)*

I would like to have the following question(s) answered:

I would like to make the following statement for the record:

Form 4 AD 221 (Rev. 7/73)

(1) 1 The EIR indicates that the number of congested intersections will increase to more than 70 under some alternatives. Recognizing the delicate balance which exists on downtown streets, won't 70 congested intersections translate to total gridlock paralysis? At a minimum it will increase the incidence of total gridlock. Gridlock risk does not appear to be addressed.

(2) 2 The impact on S.F. MUNI bus service will include schedule adherence impacts (bunching) perhaps more so than increased running time. This issue is not highlighted. How many riders will be negatively effected by schedule disruptions on affected lines? Which lines will be affected

(3) 3 Where will the 105,000 ADT currently carried by Embarcadero Roadway ~~and~~ ~~[redacted]~~ Freeway be diverted to?

(4) 4 Why weren't weekend and off-peak traffic impacts addressed?

received
info center
11/30/84
2:00 pm
CP

RESPONSE TO COMMENT LETTER I-10.

I-10.1: An increase in the number of "congested" intersections does not necessarily translate into total gridlock in downtown. Traffic would be moving and intersections would be cleared even under "congested" conditions. Please see Response to Comment C-5.1 and G-19.2 for discussions on the state of traffic flow at "congested" intersections. However, an increase in the number of "congested" intersections does increase the incidence of gridlock in the absence of manual traffic control. The risk of intersection blockage and its consequence on travel time and delay were pointed out in the DEIR (page V-74). In order to reduce the risk of gridlock, manual traffic control could be required at 10-20 intersections (depending on the alternatives) along major freeway access routes during the p.m. peak period.

I-10.2: Many factors affect schedule adherence; not all of them are traffic related. The projected travel times for representative transit trips (Table E-1, page A-43) and projected transit vehicle delays on affected routes (Table E-4, page A-46) provide an adequate measure of the possible effect of surface traffic conditions on transit schedule adherence. The projected additional transit person-hours of travel due to surface street congestion (Table I-2, A, page I-18) provides a further measure of the number of riders that would be affected by increased surface street congestion.

I-10.3: Currently the Embarcadero Freeway ramps at Broadway, Clay and Washington, Folsom and Fremont carry 2,100 vehicles inbound and 2,570 vehicles outbound during the p.m. peak hour; a total of over 4,600 vehicles. In the Embarcadero Freeway removal alternatives, about 7% of the Embarcadero Freeway trips would be diverted to transit. The remaining trips were assigned to surface routes connecting with the new and existing I-80 and I-280 freeway ramps. The Embarcadero would be the most utilized north-to-south corridor followed by Beale, First, Fourth and Montgomery. Some trips were also assigned away from the downtown area by using westbound Broadway or U.S. 101 and Franklin/Gough/Van Ness (about 10%). Please see more detailed discussion on distribution of Embarcadero Freeway trips in Working Paper 1.5.6, Travel Demand Forecasting/Analysis.

I-10.4: Surface street traffic impacts were analyzed for the p.m. peak period because the impacts are more severe during this period to most of the system users. Evaluation of traffic conditions during other time period would not provide a further index of the most critical impact. Please see Response to Comment C-5.2 for further discussion on midday traffic impacts.

Neal Johnson
2464 Alamo St.
Pinole, CA 94564

Dear Sir,

I have reveiwed the I-280 TCF Draft EIR with great interest. I am pleased to find that alternative IV-A not only compares very favorably with the other alternatives presented, but also combines all of the treatments that I personally favor.

Of the choices offered within alt. IV-A, I recommend that the Ferry Trolley Turnaround utilize the left turn at Washington and curb lane on the Embarcadero southbound for layover, an underground pedestrian crossing near the Ferry Building, and no special turnaround for the E-line at the SP Depot.

I also suggest that the design of the E/F line & Muni Metro intersection and turnaround be modified as follows:
Move the Muni Metro Portal and underground turnaround loop to south of the Howard/Steuart intersection.
Move the E/F intersection west to Steuart and continue the E line south on Steuart and around the Muni portal.

This would provide the advantages of reducing rail movements in a critical portion of the Embarcadero roadway, provide better service to a Muni Metro Station near Mission and Steuart, reduce construction under Justin Herman Plaza, and provide better auto access on Steuart between Mission and Howard.

I am curious as to why all alternatives include an extension of Davis to Washington. This would not significantly improve circulation since Drumm and Sacramento provide the same movements. The location of a major bus loading and layover area on Davis between Sacramento and California would not facilitate the use of Davis as an alternate to the Embarcadero for freeway access. If parking is the consideration for this extension, I suggest that the Maritime Plaza parking structure be extended to Drumm and a pedestrian bridge be built from the extended roof plaza to the park.

I made a suggestion earlier in the study regarding the treatment of the Embarcadero Freeway. Although I am satisfied with the treatment offered in alternative IV-A, I would like to know why the proposal didn't get very far. The proposal was to shorten the the freeway further, providing Skyway access from Folsom, and Bay Bridge access with Bryant and Harrison.

Also, the pullback of I-280 to Sixth should be continsent on the developers of Mission Bay paying the additional cost.

Thank you for an excellent study.

Sincerely,

Neal Johnson

Neal Johnson

RESPONSE TO COMMENT LETTER I-11.

I-11.1: Comment noted. The Commentator favors Alternative IV.A.

I-11.2: The Commentator's recommendations for the proposed treatments of trolly turnaround at the Ferry Building, the underground pedestrian crossing near the Ferry Building, and the E-Line terminus at the SP Depot area, in Alternative IVA, are noted.

I-11.3: Suggestions noted. A Muni Metro breakout south of Howard Street is an option investigated in Alternative VA. Moving E/F-Line interface to Steuart and continuing E-Line south on Steuart may cause conflicts with the new on-ramp from Howard and the Embarcadero.

I-11.4: The extension of Davis to Washington is proposed only in the alternatives which include the Embarcadero Freeway removal. It is proposed to improve local circulation as well as access to and from the Embarcadero surface road, taking advantage of the removal of the Washington/Clay ramps.

I-11.5: The Commentator's earlier suggestion regarding the treatment of the Embarcadero Freeway was evaluated by the I-280 study team. It was the study team's assessment that the Bryant/Harrison access to and from the Bay Bridge would significantly disrupt the freeway access pattern and impede access to the waterfront, while other merits of the suggestions are adequately reflected in the proposed treatment for the Embarcadero Freeway in Alternative IVA.

I-11.6: Comment noted. Cost-sharing with developers who benefit from the proposed transportation improvements is identified in the DEIR as a potential funding source. The DEIR discusses the possibility of assessing property owners that benefit from certain of the elements, such as the I-280 pullback, for the cost of these items (page V-39). If an alternative is selected that includes this element, an assessment district or a more direct means of charging property owners could be considered for financing.

QUESTIONS & COMMENTS

by Amos Roos, 988 Union St. #201, San Francisco 94133

on the Draft Environmental Impact Report for the I-280 Transfer Concept Program.

QUESTIONS

1

1. The report describes Muni operations in terms of headway, or frequency. This seems inappropriate for service from and to the PCS terminal, where trains operate on a schedule in which headway is a minor factor. Direct communication between Muni and Caltrans dispatchers could facilitate sending LRVs to meet arriving and departing trains.
   (a) If Muni cannot meet trains, please explain why not.
   (b) If Muni can meet trains, please estimate the beneficial impacts this would have on Muni and on PCS ridership levels.

2

2. Alternatives V and VA include PCS extension to downtown and Muni Metro extension to the Fourth & Townsend station. While either one of these extensions might make sense, it appears to me that they serve fundamentally the same purpose.
   (a) Please identify the specific objectives served by building both.
   (b) If the two lines are not considered redundant, please explain why not.

3

3. Proposed redevelopment will greatly increase traffic at each of the three PCS grade crossings suggested in Alternative V.
   (a) Please estimate how often commuter trains can be be expected to hit highway vehicles at each intersection under Year 2000 levels of PCS and street traffic.
   (b) Please estimate the probable cost of these accidents in personal injuries and property damage.
   (c) Please state whether the delays to automobile, Muni and truck traffic at these grade crossings have been included in the calculations summarized in the report.

4

4. There have been two recent proposals for relocating the PCS terminal. Caltrans in October proposed a Howard Street location, and the Mayor has apparently agreed with Santa Fe Southern Pacific on a Seventh Street location. I realize that these proposals surfaced after completion of the Draft Report, and that its scope was and is limited. Nonetheless, please indicate the principal effects that Caltrans' and the Mayor's proposals would have on the report's conclusions.

5. Muni is proposing an F streetcar line, which might approach the Embarcadero from either Market or Howard Street. If the Howard route is selected, Alternative III calls for a "grand union" track junction in Steuart Street just north of Howard. While the F line is outside the scope of this report, the junction itself is clearly within that scope.

(a) Please explain the need for the grand union, specifically, why simple turnbacks and yard leads could not replace some ot the grand union's sixteen track crossovers and why the connection between E and F lines cannot somehow be placed above the Muni Metro track before it surfaces to continue to the PCS station.

5

(b) Please comment on the potential for train-train collisions at a grand union, and estimate the probable cost of such accidents in personal injuries and property damage.

(c) Please state whether the delays to Muni traffic at this junction have been included in the calculations summarized in the report.

COMMENTS

6. As I believe each PCS grade crossing in Alternative V will take several human lives over a period of years, I urge that PCS grade crossings be rejected.

7. The need for the "grand union" in Alternative III is far from clear. Muni's Church/Duboce junction resembles a bent grand union, and I've observed how poorly it functions. The need for full-time staffing makes it expensive to operate; its delay is a source of frustration to employees as well as passengers; and human error could lead to an accident causing substantial loss of life. So I urge that any "grand union" streetcar junction be rejected.

6

8. Part or all of the section of I-280 between Third and Sixth Streets would be converted to an elevated parking lot under Alternatives I and II. This massive structure would be rendered more conspicuous by its proximity to Mission Bay, which will be an attraction for visiting officials (public and private) as well as ordinary tourists. Future tour guides could -- and probably would -- point it out: "And to the north you see the most expensive car park in history!"

Let's not maintain such an obvious and ugly reminder of past mistakes. I urge that any portion of I-280 not opened to traffic be demolished. As the portion east of Sixth Street has more lanes than would ever be utilized, I would prefer "pullback" to that point, as in Alternatives IV and IVA.

RESPONSE TO COMMENT LETTER I-12.

I-12.1: A major function of the proposed Muni Metro extension and E-Line service is to serve local transit needs in San Francisco. The level of service (service hours, frequencies, etc.) on Muni Metro extension and E-Line will be dictated by local transit needs. In as much as they also provide access to downtown and the waterfront for PCS commuters, coordination with PCS schedules will be an important consideration in setting the schedules for these services. Such coordination between PCS and Muni services has been reflected in the Muni and PCS ridership projections presented in the DEIR.

I-12.2: As stated in the Muni 5-year plan, the objective of the Muni Metro extension is to serve the transit needs in the Bayshore corridor. The extension to the existing SP Depot is the first phase of a long range plan for Metro extension. The PCS extension serves a different market; namely, commuters from the Peninsula.

I-12.3: A detailed train/vehicle accident analysis for each railroad grade crossing was not performed in the I-280 study. However, standard grade crossing protections (gates, flashing lights and bells, signals) were included as part of the concept design for the at-grade PCS extension in Alternative V. The potential for transit/vehicle conflict in a protected environment will be minimum. The delays to autos, transit vehicles and truck traffic at the grade crossings have been included in the travel time and delay calculations presented in the DEIR.

I-12.4: It is presumed that the Howard Street location referred to in the comment letter is the Transbay Terminal location proposed by Caltrans for relocating the PCS terminal. The Transbay Terminal location concept has been analyzed in Alternative VA. A Seventh Street terminal location would be less effective than the Transbay Terminal location in serving PCS commuters with destinations in the Financial District and the downtown area. As a result, it may reduce the PCS ridership potential and compromise the objective of this downtown extension. However, there could be significant differences between the two terminal locations in urban design, social-economic, surface street traffic, and cost impacts. No comparisons can be made without a more detailed study of the Seventh Street proposal.

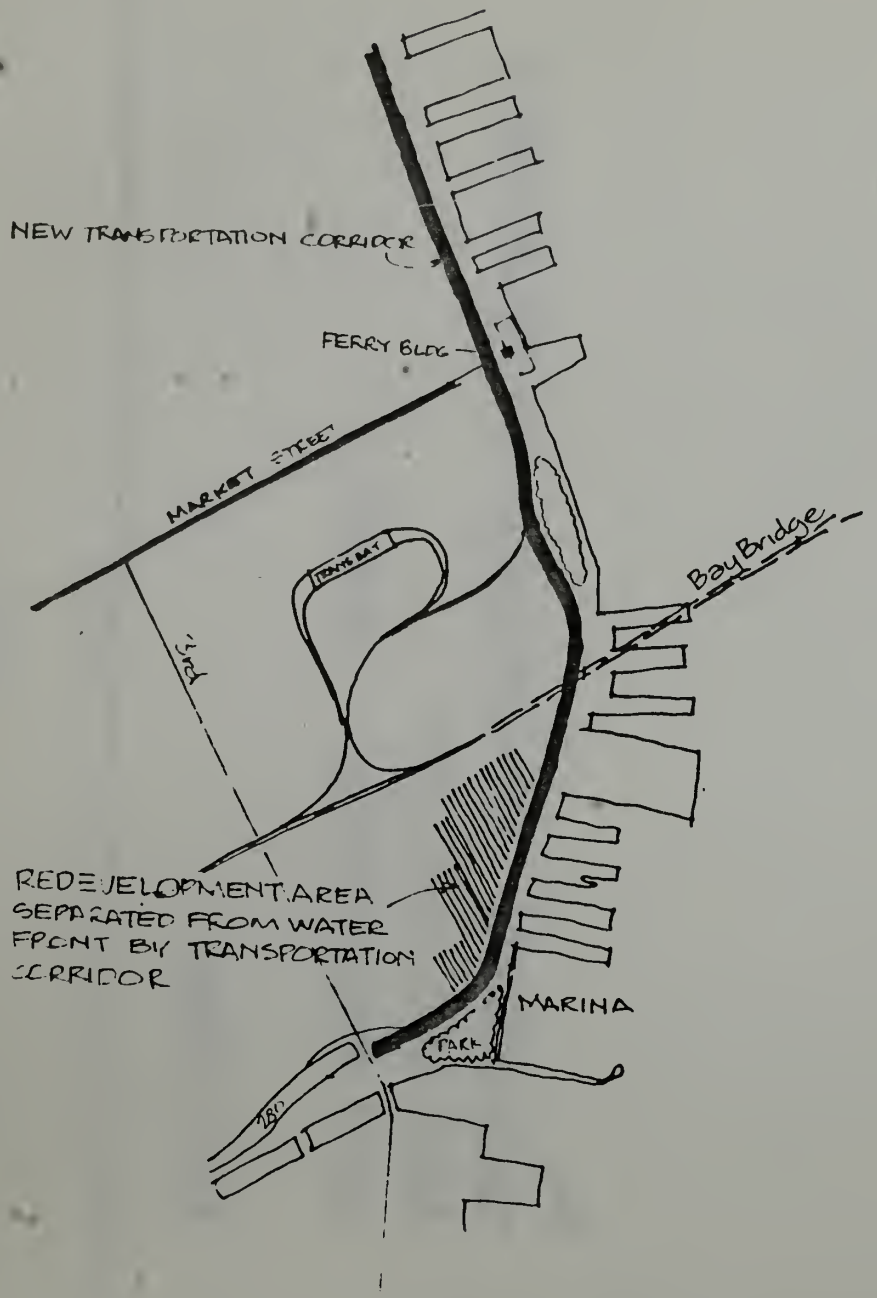
I-12.5: The "grand union" is proposed to provide maximum operating flexibility by allowing all possible movements between Muni Metro and E/F-Line tracks. The south-east connection is required for E-Line mainline operation. The south-west connection provides a yard lead for F-Line vehicles on the Howard-Market segment. The north-east connection provides future Metro service to the northern waterfront. The north-west connection provides alternative routes for Muni Metro and E/F-Line during emergencies. A grade-separated design in Alternative III would not allow for all the movements. Since not all the legs will be heavily utilized and vehicles will be at very slow speeds and controlled by switches and signals at the "grand union", the possibility of train-train collision would not be greater than at any other rail junction. The delays to Muni traffic at the "grand union" have been included in the transit travel time and delay calculations presented in the DEIR.

I-12.6: Comments noted.

COMMENTS on the I-280 TRANSFER CONCEPT STUDY

by
GEORGE McLAUGHLIN-ARCHITECT
469 MISSISSIPPI
SAN FRANCISCO 94107

NOV, 1984



VII-52

From reading your study (no easy task) your plans appear to be designed to absolutely ruin our waterfront with a transportation corridor which will basically be a solid line of cars, busses, trams, trucks, rail roads etc which will forever seperate us from our waterfront. It also 1
appears that even if we are able to cross your street alive, any pleasant use of our water front will be made impossible by the noise and ugliness of all of the above.
I don't think this is a very good idea and I think the citizens of San Francisco derserve better

3. Purpose and Need

A primary purpose of the I-280 TCP will be to provide significant transportation improvements for the San Francisco Bay Area, while enhancing the character of the northeastern waterfront area of the City. Satisfactory levels of mobility will be sought for the near future as well as through the year 2000 and beyond. The TCP should provide the mix of transportation projects that best meets the needs of existing and future residents, commuters, and other users of the transportation facilities in the project corridor. One important criterion in selecting the TCP projects will be the extent to which they achieve the goals and objectives adopted by the Policy Control Committee. These goals and objectives are listed in Appendix A of this report.

page T-4 of report

VII-53

Your premise as stated above seems to indicate that you are planning for transportation needs first and than will plant bushes and trees to mitigate the damage you do.

I THINK THAT YOU HAVE YOUR PREMISE BACKWARDS

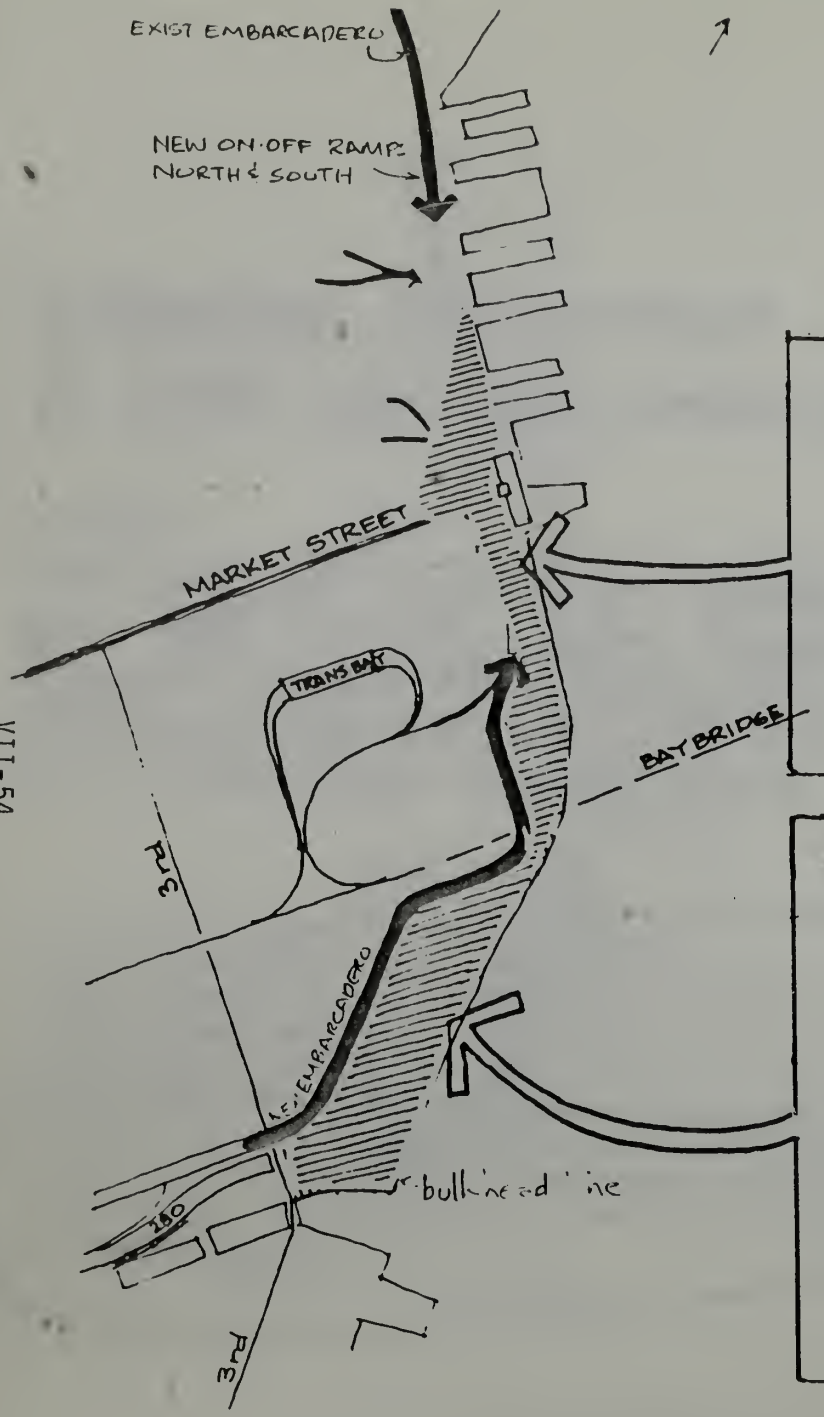
THERE MUST BE A BETTER WAY

2

A more logical premise might be:

To look at the San Francisco Water front as an irreplacable resource which should developed primarily for housing/commercial and pedestrian based recreation uses for the people of San Francisco

Any traffic functions which must be placed in this area must be secondary in importance to the above





EMBARCADERO FREEWAY AREA

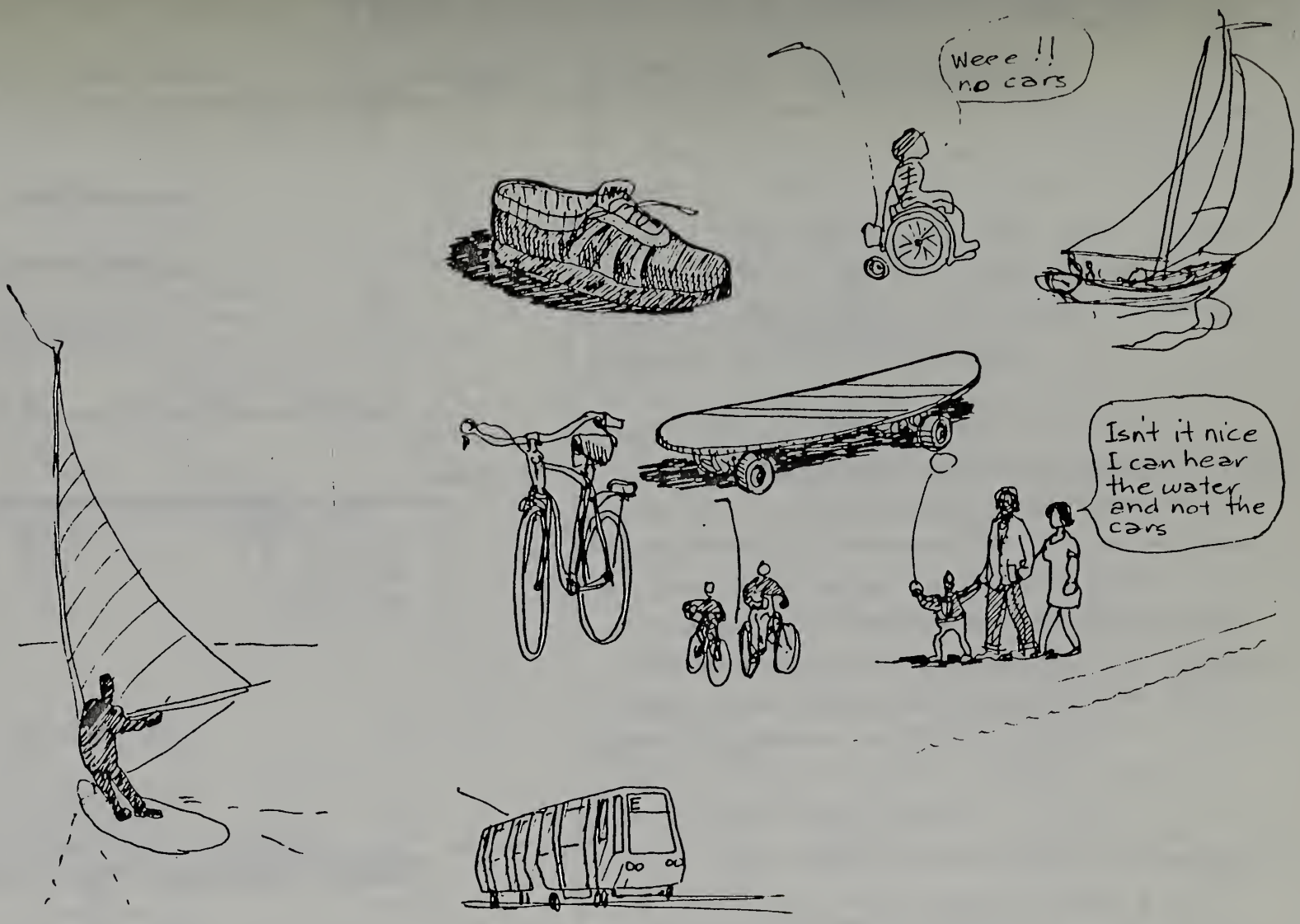
1. Don't remove freeway
2. Add new on/off ramps at each end
3. Remove all surface roads under freeway and relocate their traffic to freeway
4. Develop surface area as a plaza to joining the waterfront/Ferry Building with Justin Herman Plaza & the rest of down town

3

RINCON POINT/SOUTH BEACH AREA

1 Relocate new Embarcadero road as far from waterfront as possible. This area is a Redevelopment Area planned for almost 100% new construction, so you can put the new road anywhere you want it, within reason
2. Phase out piers as quickly as possible. Provide interim access via service roads
3. Develop water front areas adjacent to new housing as complete traffic free pedestrian promenades

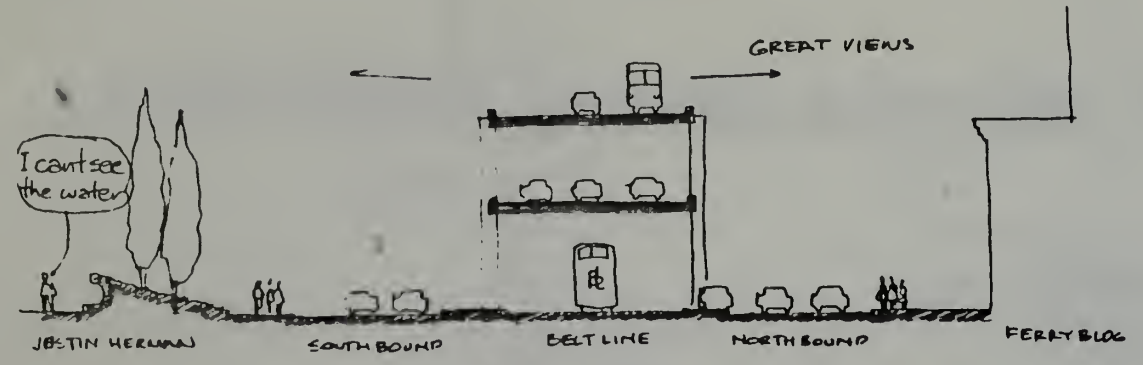
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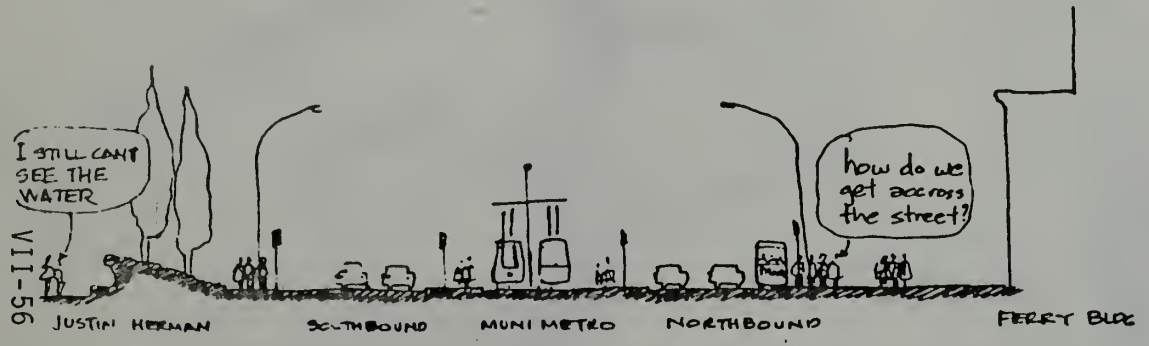
PREFERRED TRANSPORTATION ALONG THE WATERFRONT

EMBARCADERO FREEWAY



EXISTING

Surface roadway relatively under used as most heavy commuter traffic is up on the freeway. Development of surface level is cluttered with street & tracks and is ugly. Few pedestrians except during ferry commute rush hours



PROPOSED I-280 study

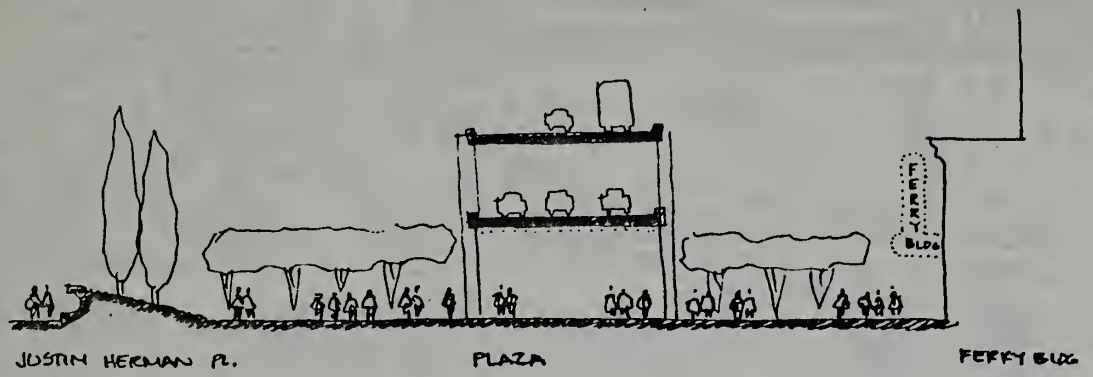
Vast area devoted to traffic is ugly. Relocation of Embarcadero Freeway traffic to serve will probably cause even more congestion than at present. Pedestrian movement, particularly with the increased number of pedestrians generated by the proposed development of the Ferry Building will be a nightmare

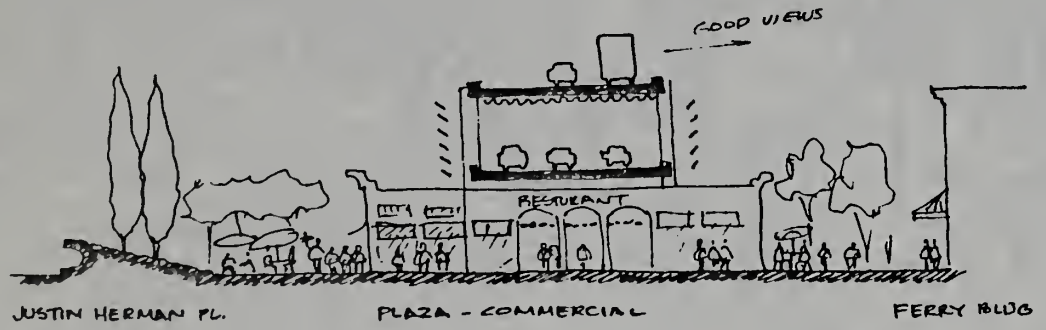


WHAT IT COULD BE

It is the surface roads which impede free pedestrian flow in the area. So why not get rid of the surface traffic by relocating it the freeway above. The ground level than becomes a traffic-free pedestrian area which could be very nice with proper development.

THE EMBARCADERO FREEWAY AS AN AERIAL TUNNEL





6

With a little imagination the Embarcadero Freeway becomes an asset not a liability. What we really need in this area is a tunnel to get rid of all the traffic. But we can't afford a tunnel, so lets make the embarcadero Freeway into an aerial tunnel. This can be done by constructing new on/off ramps at each end of the freeway. All surface traffic would be carried up and over this area. The noise generated by the traffic on the freeway would still be a problem which perhaps could be reduced by providing noise baffles The ground areas could be developed as completely open pedestrian plazas or perhaps some areas under the freeway could be developed as commercial areas to help to reduce the bulk of the freeway

note: If completely necessary the muni-metro could be routed through this area with minimal impact



HERB CAEN

PIDDLING ON: If a domed stadium is built at China Basin, a project that looks increasingly iffy, the 280 freeway could never be extended to hook up with the Embarcadero Freeway, another dream that appears doomed. Of course, it COULD be thrust right through the stadium, crossing third base and possibly scoring. A freeway that would deliver customers into the park is something to think about for a few seconds... Meanwhile, Miz Feinstein continues to threaten the destruction of the Embarcadero Freeway, one of the few places from which one can study the downtown skyline in all its stark drama. Once upon a time I would have agreed with her. That was before it became painfully obvious that the stub-ended roadway, killed in midflight by the famous "freeway revolt," simply shunted all traffic onto Broadway, making a quiet, contemplative lunch at Enrico's out of the question ... Rather than squander millions on tearing down the freeway, better we should extend it back onto the Embarcadero and into Bay St. I see Bay as one-way east during the morning commute and one-way west in the evening. I also see strange dots and pinwheels before my eyes.

7

expert opinion

★ ★ ★

CAENFETTI: Yes, that IS a nice esplanade running south from the Ferry Bldg., but why so bare? Where are the Friends of the Urban Forest? ... As for the elaborate plans (I.M. Pei, yet) to "improve and enhance" the Ferry Bldg., I look slightly askance at what appears to be "boutiquization" of our most beloved landmark. One Union St. is enough ... In some of our fancier, if not necessarily better, restaurants, coffee is now two dollars a cup. That's awful. I don't care how high the overhead is, coffee costs very little to produce and serve. With meals — especially those that average $50 — it should be free, both as good public relations and as a public service to cut the grease ... Nominated for oblivion: people who dial your number by mistake and crash down the phone without a word, as though it were YOUR fault. How about a "sorry," clods? Some of us run for the phone, you

SOUTH BEACH AREA

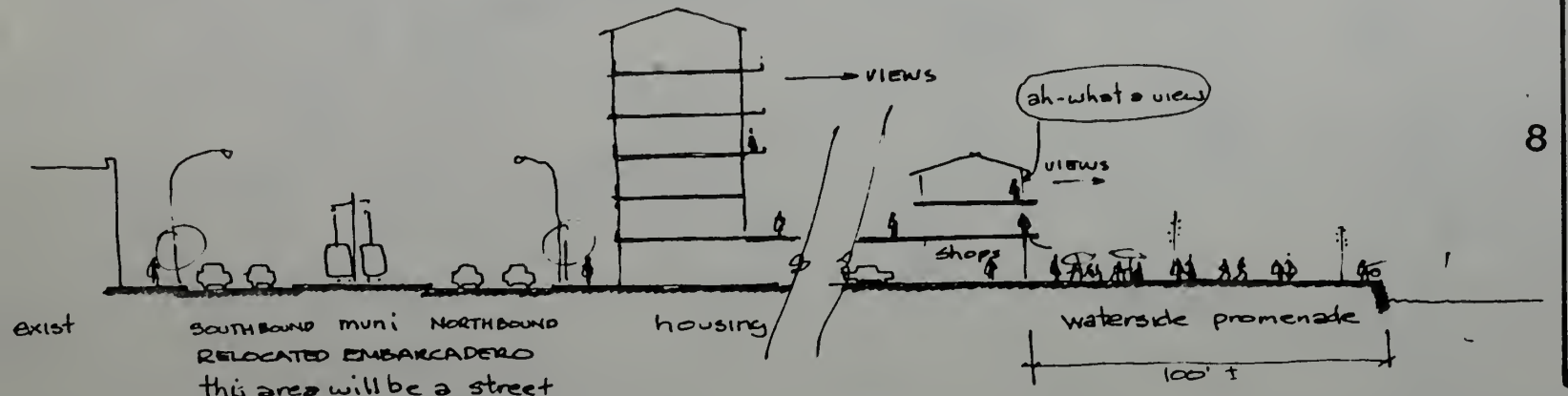
pier 38 area



This is not waterfront living. This proposed housing will be across a very wide noisy street from the water The water side promenade will also be very noisy Pedestrian access in either direction will be very difficult

PROPOSED - I-280 study

no scale



8

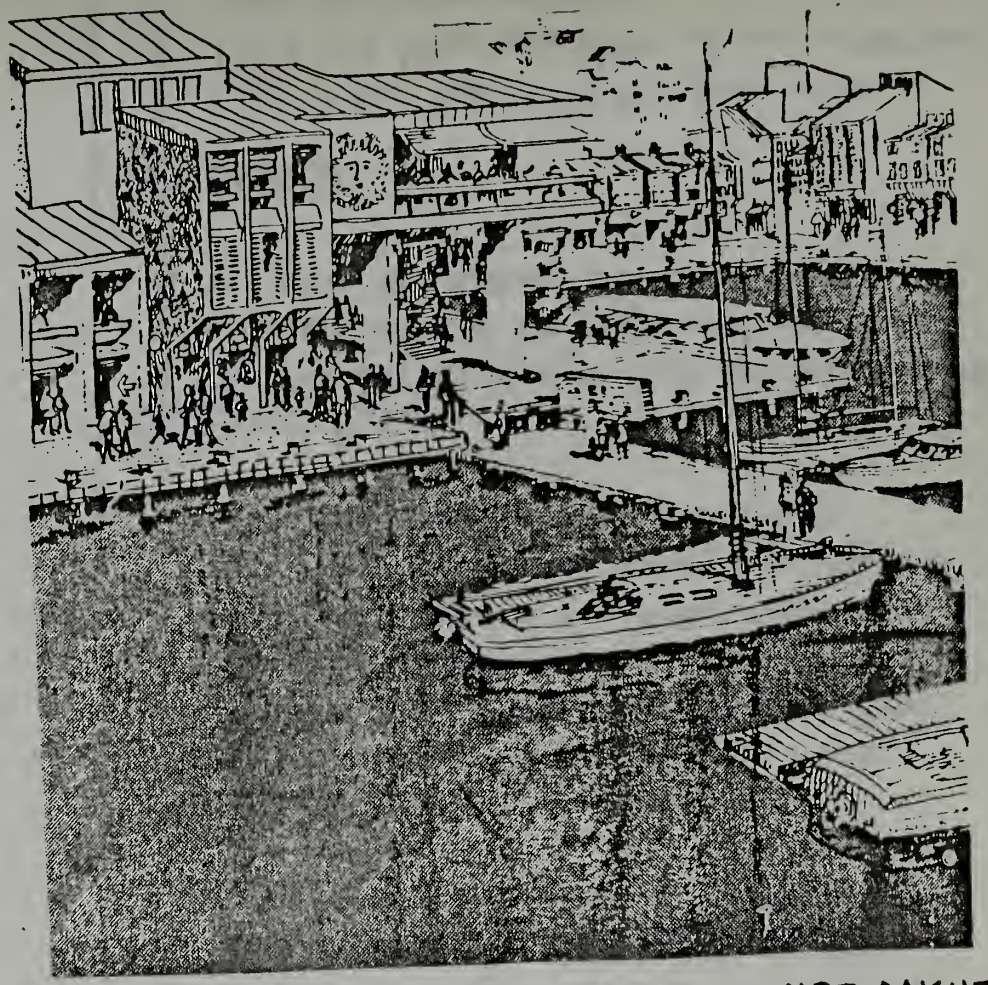
This is waterfront living You might even be able to hear the water from the housing Views will be unobstructed by cars, busses trains etc. All traffic relocated to areas away from promenade to areas that will have traffic anyway.

WHAT IT COULD BE



9 We could have a great waterside area for walking · running · living · shopping but not driving

SEE ANY CARS?



10 A WATERFRONT COULD BE BE DEVELOPED THAT MIGHT BE VERY SIMILAR TO THE TYPE OF WATERFRONT DEVELOPMENT (ABOVE) THAT WAS SUGGESTED IN THE ORIGINAL REPORT OF THE D.C.D.C. IN 1969

Muni & Muni Metro

both these systems can adequately serve the area need at routes located away from the waterfront. Users might have to walk an extra block

The Port

the existing port facilities in this area appear to be obsolete for moritime uses. Upgrading the facilities will probably be prohibitivly expensive, so why not get rid of them now and move any real maritime uses to the Southern waterfront which have more space for adequate facilities

Belt Line Railroad

This system apparently moves 75 cars a year. Must be the most expensive railroad on a per car basis. Does not seem essential particularly in this area

Utilities

Building areas can be planned to provide maintenance easements for any utilities which must remain or are too expensive to move such as the big sewer line along the waterfront

Existing Owners

Their land would probably be more valuable in a plan like this so they probably won't complain. Ownerships in areas needed for new roads could be compensated by swapping city land along the present Embarcadero

Historical Areas

Historical buildings such as the Oriental Warehouse should be preserved or moved if located in areas of new roads.

Commuters

Let them take BART-Muni etc
Don't let them clutter up our waterfront with their cars parking

Bay Bridge Anchorage

The area beneath the bridge should be developed as an open space to open up and enhance the view of the Anchorage which is an engineering work of art

Costs

12 Are any of the alternates shown in the study really feasible in light of the present economic climate. I know - the money is free because it is from Uncle Sam. But even Uncle Sam is learning that nothing is free any more in light of the deficit. This project will run up the deficit just as much B-1 bombers and 7000 dollar coffee pots.

All the following projects are currently under study in this general area of San Francisco. All seem to be being considered independantly of eachother

1. I-280 study
2. Rincon Hill – City Planning
3. Rincon Point-South Beach – Redevelopment Agency
4. Mission Bay – S.P.
5. Showplace Square
6. Ferry Bldg
7. the "Stadium" – the Mayor

Maybe it is time to do something about looking at all these projects together – Really look at them – Whats happening now will establish the character of this portion of San Francisco for the next 50 or 100 years It certainly wouldn't hurt to do a really thorough job of master planning the entire area.

It might be better to select your alternate plan that calls for doing nothing and to join with these others to develop a proper master plan for the entire area

BUT PLEASE !!
Whatever you do
Don't ruin our waterfront
with this road

RESPONSE TO COMMENT LETTER I-13.

I-13.1: The I-280 TCP alternatives have many objectives; not all of them are mutually consistent. The concept designs for the Embarcadero surface roadway reflect alternative ways to balance the transportation needs with urban design and other objectives. While the removal of the Embarcadero Freeway best achieves the urban design objectives for the waterfront, its consequences on surface street traffic and on the transportation needs of the City's residents, visitors and commuters are not insignificant. The transportation needs of these people must somehow be accommodated in the corridor. The Embarcadero surface roadway provides one outlet to accommodate these needs. Please see Comment Letter G-7, G-19, G-20 for comments on the transportation needs of affected groups.

I-13.2: Please see Response to Comment I-13.1.

I-13.3: The Embarcadero surface roadway is and will continue to be a vital access route for numerous activities along the waterfront and to the Bayshore corridor which do not use the freeway.

I-13.4: Suggestions noted. Relocating the Embarcadero surface roadway further inland would require substantial taking of right-of-way.

I-13.5: Please see Response to Comment I-13.3.

I-13.6: Suggestion for an aerial tunnel for the Embarcadero Freeway is noted. While expensive, it does not fully mitigate the urban design impacts of the existing freeway. As to surface street treatment, please see Response to Comment I-13.3.

I-13.7: Comment noted. Extending the Embarcadero Freeway into Bay Street was not a concept studied in the I-280 study.

I-13.8: Suggestion for re-alignment of the Embarcadero surface roadway through the South Beach area is noted. The trade-off will be access to the water edge vs. access to the inland areas of the City for residents in the redevelopment area.

I-13.9: Please see Response to Comment I-13.1.

I-13.10: Comment noted.

I-13.11: The Commentator's opinions are noted.

I-13.12: The financial feasibility and funding shortfalls of the alternatives were discussed in the DEIR. Please see Sec. V.B.2, pages V-31 through V-42.

I-13.13: The projects listed by the Commentator were all considered in the I-280 study in so far as they affect the I-280/Embarcadero corridor. The extent each of these projects was considered in the study varies with the status of the project at the time the I-280 study was being carried out. The Rincon Point-South Beach Redevelopment project, the Ferry Building development project, and the Mission Bay development project were specifically addressed in the study. The stadium project was not included in the analysis because the project had not been advanced to the stage that specific proposals can be meaningfully evaluated. Current developments on the stadium subject do not indicate the likelihood of a China Basin stadium in the foreseeable future.

VIII. COMMENTS AND RESPONSES - PERSONS COMMENTING AT THE NOVEMBER 15, 1984 PUBLIC HEARING (P)

minute recess. Off the record.

(Recess taken.)

CHAIRMAN PRAG: Hello there. If you have a prepared statement which is lengthy that you do not try to read it into the record, but it submit it to me. It will become part of the record. It will be reviewed by both the Commission and Caltrans just as if you had read it in. And with that, John Twichell, if I'm pronouncing that correctly, representing the Embarcadero Citizen's Committee wishes to speak. May I remind you once again, as Mr. Twitchell's coming forward that I would like you to come forward to one of these two microphones, identify yourself for the record when you do begin to speak.

MR. TWICHELL: Okay, My name is John Twichell, from the Embarcadero Citizen's Committee. A number of different people will comment on a number of different parts of the EIR here, tonight, so I would like to keep my comments very specific.

I have two particular things I would like to address, and they're along the lines of simplifying and clarifying and making more understandable what is in the EIR. There are literally thousands of pages of information in the various work documents put together here and several hundred pages here, and I think a major task at this point is basically making it understandable to the public, so

there's a much clearer idea of what this document really says.

Apropos that, the very first table in the book, section 1, page 17, says Goals Analysis Summary. Unfortunately, it is essentially unintelligible. It's a table of pluses and minuses and zeros and numbers. It's extremely difficult for the average lay person to follow. We've taken that table and put it in a very simple rank order, and ranked each of the different alternatives; first one preferred under any of these categories is first, the second one second, the third one third. Now, if you take and put that summary into this simple numerical rank order it is very clear, and it very clearly shows that Alternative IV-A is the preferred alternative within this EIR. So, one of the things we would request in this EIR is that this alternative summary be made clear, and it show the information that is contained here, which is that 4A is the preferred alternative given the various different goals within the EIR. So this is one major point and one point of simplification and one really key point in this EIR, that here you have a preferred alternative. Here's the information, let's just make it clear.

Now, also apropos that, and I'm sure we'll get into long discussions about transportation once this document is approved and we get into various hearings within

the City governmental agencies. But apropos that, I would also request that another table in here be brought up into the front summary area. And that is the table, section 5, table 12. Now, this is cumulative travel time impacts. Now this is the, if you'll pardon the overworked phrase, the bottom line of all of the transportation information that's contained in this document. It's the additional person-hours of travel during the afternoon peak, the 2 hours, rather than the other 22 that people are really concerned with. And apropos that table I would point out to people that Alternative IV-A, the one that is rank ordered first here in the document provides travel time that not only is equal to, but slightly better than the alternative which is the do-nothing alternative. In other words, if you take what is shown here as the preferred alternative from a transportation point of view, what this document says is that it provides improved travel time, albeit slight improvement, over doing nothing. So I think that is particularly important.

And I think that table, along with this other table ought to be clarified, not to be made very clear. Obviously Alternative IV-A is also the alternative that our committee favors. We see it as the implementation of the Northeastern Waterfront Plan and the Downtown Plan in the various documents that the City has for many years now

sought to implement. On that I'll end my comments, thank you.

CHAIRMAN PRAG: Thank you, Mr. Twichell. Mark Mihaly, representing the Mayor's Embarcadero Committee wishes to speak.

MR. MIHALY: Chairman Rosenblatt, members of the commission, members of the Caltrans staff, I have been asked by the Mayor's Embarcadero Committee to review the environmental document for legal adequacy. And we will be submitting written comments to you before the end of the comment period. I'd just like to orally emphasize three points very quickly. We do think that the EIR is an excellent document and that it is generally complete.

There are three areas we have specific requests. First, we'd like the document to comment more pointedly and more completely on the consistency of the various alternatives, one by one, with San Francisco's Northeast Waterfront Plan and with the Downtown Plan.

As to the Downtown Plan, the Downtown Plan has not yet been enacted. It is possible that it will have been enacted by this commission before the comments on this EIR are complete. At the moment there is no mention of the Downtown Plan whatsoever in the environmental impact sections of this EIR and I think it would be appropriate if it were mentioned, and if we were given an idea as to the

RESPONSE TO COMMENTATOR P-1

P-1.1: Please see Response to Comment G-12.1 which is the same comment as P-1.1.

P-1.2: The information contained in Table V-12, at page V-75 of the DEIR, appears on Table I-2, at page I-18 of the summary chapter. While peak-period travel information is an important component of the DEIR, the information must be viewed within the larger context of other transportation information as well as other aspects of the overall environmental analysis.

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1

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2

ranking of consistency between each of these alternatives and the Downtown Plan and its goals. As to the Northeast Waterfront Plan there -- there's quite a bit of material in the EIR, especially in section 7, pages 14 to 23. However, it's very diffuse. I think you need a chart which -- (Feedback). Can this be adjusted?

It's very diffuse. We need a chart to begin indicating the overall rating of the various alternatives in terms of their consistency with the goals of the Northeast Waterfront Plan.

3 Second item is a minor traffic point, which I think should be clarified. There is substantial discussion in this EIR of possible increases in congestion on city streets. The 1983 San Francisco Cordon Count contends that there has actually been a decrease of several percentage points in congestion on San Francisco City streets in the last 18 years. Now, I don't know if that's true, and I don't know if that's accurate. But I think that that's an important city document and there should be some attempt in the EIR to reconcile the conclusions of that document with the conclusions of this document.

4 Thirdly, the issue of revenues to the City. There is a lot of information in this EIR that is not strictly environmental. It is, instead, financial, socio-economic. And that's fine, that's a choice that you can make, as long

as you have embarked on that analysis. I would suggest that it be extended to include a brief discussion, a quantified discussion of increase in tax revenues to the City, or decrease, if that's appropriate, amongst the various alternatives. Thank you, very much. That's the extent of my comments.

CHAIRMAN PRAG: Thank you, Mr. Mihaly. Jane Winslow, representing the Telegraph Hill Dwellers wishes to speak.

MS. WINSLOW: I'm the president of the Telegraph Hill Dwellers. We have fought the freeway from its beginnings twenty years ago, and we continue to fight for the demise of the stub end of the freeway that continues to be there. We've consistently supported and participated in the development of the Northeastern Waterfront Plan. This EIR and its alternatives bring the plan one step closer to its completion. We urge you to certify the EIR in a very timely manner. Thank you.

CHAIRMAN PRAG: Thank you, Ms. Winslow. Bob Spicker, representing the Golden Gateway Center.

MR. SPICKER: I'm Bob Spicker, general manager of the Golden Gateway Center, and a member of the Embarcadero Citizen's Committee. I have reviewed the I-280 Transfer Concept Program and have participated in numerous meetings and group discussions regarding the alternatives

RESPONSE TO COMMENTATOR P-2

P-2.1: Comment noted.

P-2.2: Please see Response to Comment G-12.2 which encompasses many of the same issues as Comment P-2.2.

P-2.3: Please see Response to Comment G-12.4 which is the same comment as P-2.3.

P-2.4 Please see Response to Comment G-12.6 which is the same comment as P-2.4.

Please note that oral comments of Commentator P-2 are all covered in his written comments in Comment Letter G-12. Please see Responses to Comment Letter G-12 for full responses to these comments.

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RESPONSE TO COMMENTATOR P-3

P-3.1: Comment noted.

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reviewed in the EIR. Our interest in the I-280 study is based on the economic opportunities and the transportation considerations. We are satisfied that the transportation issues are adequately addressed in the draft EIR. As owners of substantial development in the Embarcadero, we view the approval of the EIR as an important ingredient in our continued interest in this vital area of San Francisco.

These benefits include increased property values, and in particular development potential. Thank you.

CHAIRMAN PRAG: Thank you, Mr. Spicker. Norman Rolfe, representing San Francisco Tomorrow.

MR. ROLFE: I, too, both as an individual and a representative --

CHAIRMAN PRAG: Mr. Rolfe, will you identify yourself.

MR. ROLFE: I'm Norman Rolfe, that's spelled R-o-l-f-e, representing San Francisco Tomorrow. I, too, have lived with the freeway and some of the waterfront plans for a good many years, both as an individual and as a representative of San Francisco Tomorrow. San Francisco Tomorrow advocates the waterfront be improved by the removal of the elevated freeway, by the construction of the E-line, the streetcar line along the waterfront, and rebuilding the Embarcadero into a four, basically, a four lane boulevard. Other additional transportation improvements would be the

RESPONSE TO COMMENTATOR P-4

P-4.1: Comment noted.

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Muni Metro loop and the extension of the Muni Metro to 4th and Townsend. The loop, by the way, is already under way through other sources.

The transportation impacts are quite well described in the EIR. In fact, I'd say it's, if anything, overdrawn. The removal of the freeway and the transit improvements which are covered in the various alternatives would lead to improvement in the general environment and atmosphere along the waterfront, to the ambiance of the waterfront and the surrounding areas. 2

The EIR, as a matter of fact, appears to be a worst case analysis. It appears that the assumptions that was made, it was assumed -- the worst possible conditions were assumed, and my feeling is that the impacts on traffic and the other factors would not really be that bad. Mr. Mihaly did make some reference to that, too. It should be investigated for the EIR. We're really, actually, not terribly concerned about the automobile travel times if they increase. We are interested in transit times, and we are interested in transit usage. We're interested in increase -- making transit more attractive, increasing its usage, and decreasing automobile usage, thereby leading to environmental improvements which we feel will happen as a result of the plans outlined in this proposal. As I said, the EIR adequately, in fact more than adequately

describes the impacts. If anything, they're overdrawn. So we feel that you should certify the EIR and get on with this process of improving our waterfront and our transit system. Thank you. 3

CHAIRMAN PRAG: Thank you, Mr. Rolfe. Mike Berline, if I'm pronouncing that correctly, representing the Committee to Save Aquatic Park.

MR. BERLINE: If you'd like the statement in writing.

CHAIRMAN PRAG: You'll submit it in writing, all right. Richard Hood, representing Peninsula Rail 2000.

MR. HOOD: My name is Richard Hood. I represent Peninsula Rail 2000. We're a citizen's group working to improve the commute service on the Peninsula to San Francisco. Peninsula Rail 2000 objects to the I-280 transfer study for the following reasons. The study gives an unfair and misleading view of the concept of a downtown extension of peninsula trains. It overestimates the value of the MUNI Metro extension for Peninsula commuters. And finally, the study only examines the Caltrans proposals for extending trains, a proposal which is unworkable, and whose adverse environmental impacts are not fully described in this document.

Peninsula Rail 2000 strongly favors Caltrain's downtown extension because this project is a prerequisite

RESPONSE TO COMMENTATOR P-5

P-5.1: Comment noted.

P-5.2: The transportation impact analysis was based on growth projections for San Francisco. It was not a "worse case" analysis. Please see Response to Comment G-12.4 for further discussion on travel demand projections.

P-5.3: Comment noted.

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CHAIRMAN PRAG: Thank you, Mr. Rolfe. Mike Berline, if I'm pronouncing that correctly, representing the Committee to Save Aquatic Park.

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Peninsula Rail 2000 strongly favors Caltrain's downtown extension because this project is a prerequisite

RESPONSE TO COMMENTATOR P-6

P-6.1: Please see Responses to Comment Letter G-13 which encompasses written comments from the Committee to Save Aquatic Park.

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Peninsula Rail 2000 strongly favors Caltrain's downtown extension because this project is a prerequisite

for the survival and upgrading of the Peninsula line to rapid transit mode. The chart on page A-44 which shows an increase in ridership of 45% by the year 2000 even if nothing is done is ridiculous. As we've seen in the past twenty years, dramatic increases in travel demand have not led to increases in train ridership. Instead, the opposite has happened. Travel has gone up while ridership has gone down. The lack of a proper downtown station has held ridership artificially low, and is likely to continue to do so in the future. Table 4-12, which calls 5500 hundred passengers the existing demand is misleading. This is actually the existing ridership, which is nothing to do with demand.

A proper passenger demand estimate could be better made by comparing an upgraded Peninsula service to the BART service area. A similar demand should exist on the Peninsula. Although the EIR is not supposed to take sides it is set up so that the Muni Metro extension to 4th and Townsend is overvalued. The Muni Metro extension is a good project for serving South of Market development, but it will do virtually nothing for Peninsula commuters because it requires the same additional cost and travel time inconvenience as the existing bus service. In fact, the existing MUNI routes, 15, 30, and 42 buses would still provide faster and more direct service to their respective

areas than the rail line. The travel timetable on page A-43 is also slanted in favor of a Muni Metro extension. Oakland to San Mateo with a downtown train extension is 89 minutes. The same trip with a MUni Metro extension is 91 minutes, only a two minute difference. Despite the elimination of a transfer this table also shows travel times between the Transbay Terminal and San Mateo via the Peninsula Commute Service ranging between 50 and 63 minutes, even though the slowest existing train takes 34 minutes to make the trip. Samtrans travel times are shown as ranging between 57 and 67 minutes even though the fastest existing bus takes seventy minutes.

Our final point concerns the EIR's consideration of only Caltrans proposals for downtown train extensions. The Transbay Terminal proposal is unworkable for a variety of reasons, many of which are cited in the report. On page V-28 the report claims the Peninsula extension would displace 73 businesses and three parking lots, employing between 500 and 1700 workers. Yet Caltrans has no authority to acquire land through eminent domain, so the likelihood of any displacement is small.

On page 365 the report says, "While technically feasible, the subway alignment for the Caltrain's extension would be expensive to construct because of undesirable soil conditions and potential conflicts with major existing

utilities. It could also have short term as well as long term impacts on the proposed housing development in the South Beach subarea of the redevelopment project. Therefore, although not examined in detail in the I-280 study alternative alignments and terminal locations for the proposed extension should be investigated further should this project be advanced for further development. Caltrans, however, refuses to look at other alignments, even though it has already changed its position on extension five times.

Finally, in chapter seven, a long discussion of environmental impacts includes nothing about the impacts of running diesel trains in a long underground tunnel. Running diesel trains in subways isn't done anywhere else in this country, nor, perhaps, the world. Yet Caltrans intends to do it in San Francisco without describing the environmental impacts. The fact that Caltrans sponsored the I-280 EIR which is so heavily advised in favor of a Muni Metro extension and against a train extension leads Peninsula Rail 2000 to doubt the state's interest in continuing to run the Peninsula trains. The lack of any firm, long term commitment for the Peninsula trains and Caltrans' recently released long term plan reinforces this suspicion. Without Caltrans' commitment to public transportation none of the transit improvements in this project are likely to survive as long as the present institutional

framework continues. This is why Peninsula Rail 2000 has called for the creation of a special district to operate the Peninsula train service, and is the only organization with a comprehensive long range plan. Thank you very much.

CHAIRMAN PRAG: Thank you, Mr. Hood. Christopher Martin, representing the Fisherman's Wharf Merchant's Association. You could speak from that mike if you wish. I think that's live, also. Please identify yourself.

MR. MARTIN: My name's Christopher Martin and I am president of the Fisherman's Wharf Merchant's Association. The Fisherman's Wharf Merchant's Association has taken no position on whether or not the Embarcadero Freeway should be removed. We are, however, vitally concerned that if the freeway is removed access to the Fisherman's Wharf area by tourist and recreational motorists, particularly from the South and from the East not be reduced. It is already inadequate.

Unfortunately, Fisherman's Wharf is very reliant on automobiles. Roughly seventy-five to eighty percent of the visitors to the wharf arrive by autos and despite changes with transportation policies and even improvements with transportation access that reliance won't disapper overnight.

I'll briefly summarize a few of our concerns and raise questions where it's appropriate. Most of our concerns

RESPONSE TO COMMENTATOR P-7

P-7.1: Please see Responses to Comment Letter G-10 which encompasses the same comments from the Commentator as he testified here.

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I'll briefly summarize a few of our concerns and raise questions where it's appropriate. Most of our concerns

relate to access of vehicles and parking. The lack of mitigation for the loss of traffic service to the Fisherman's Wharf area which will result from all of these alternatives under consideration, the removal of the freeway will transfer all the evening peak traffic, period, traffic, all evening peak period bridge backup storage to the street system on both sides of Market Street.

How will this added queuing affect tourist and recreational vehicles from the south and the east desiring to get to the Fisherman's Wharf area in the early evening hours? Data collection for the EIR is already over three years old. Have there been any changes during this time? Traffic access to the Columbus Avenue quarter will be seriously restricted by those alternatives which add the delay in the downtown area. How will this restriction of access to the Fisherman's Wharf area and to the north, in general be mitigated?

2

Fisherman's Wharf is now served by the Broadway ramps and by the Embarcadero Freeway. How can a reconstructed Embarcadero, alone, a four-lane surface street with at-grade intersections possibly provide traffic service that the north waterfront currently enjoys? We're also concerned about the loss of prime, sought after parking spaces in the Fisherman's Wharf area without apparent mitigation in all the alternatives, which involve the E-line.

The economic analysis ignores the impacts on retail businesses. The duration of visit is important to the amount of economic activity by visitors to the Fisherman's Wharf area. How will the duration of stay in the Fisherman's Wharf area because of the increased morning and evening auto traffic times and the length of peak periods be affected? We're concerned that none of the data analyzed weekend traffic, and the trends that the decades ahead will mean with that. It's geared to, basically, commute hour traffic five days a week.

I want to stress that Fisherman's Wharf is not only a tourist attraction, but it's an intensive area of commercial fish activity as well. What will be the impact on these businesses by the access differences between the various alternatives? We're hopeful that many of these concerns, and the others that we will submit in writing will be answered, but there is one thing we would like to request. Since the deadline is the end of the month, it's short on comment and we would like an extension of two weeks. We can give better testimony and get a better consensus of members during that time. Thank you.

CHAIRMAN PRAG: Thank you, Mr. Martin. Sue Hestor, representing San Franciscans for Reasonable Growth.

MS. HESTOR: Sue Hestor, H-e-s-t-o-r, counsel for San Franciscans for Reasonable Growth.

RESPONSE TO COMMENTATOR P-8

P-8.1: Comments noted.

P-8.2: Please see Responses to Comment Letter G-20 from Mr. Martin, which encompasses the same comments concerning access and parking impacts in the Fisherman's Wharf area.

P-8.3: Secondary economic effects on specific business types and locations due to direct transportation impacts will be addressed when projects are selected and specific project designs are proposed for project-level environmental clearance. The DEIR on the broad Transfer Concept Program cannot provide sufficient detail to make such secondary analyses meaningful.

P-8.4: Please see Responses to Comment Letter G-7 from Standard Fisheries Corporation and Comment Letter G-20 from Mr. Martin, which encompasses detailed comments concerning impacts on delivery services.

P-8.5: Deadline for receiving written comments from the Fisherman's Wharf Merchants Association was extended as requested. Written comments have been responded to. See Responses to Comment Letter G-20.

The economic analysis ignores the impacts on retail businesses. The duration of visit is important to the amount of economic activity by visitors to the Fisherman's Wharf area. How will the duration of stay in the Fisherman's Wharf area because of the increased morning and evening auto traffic times and the length of peak periods be affected? We're concerned that none of the data analyzed weekend traffic, and the trends that the decades ahead will mean with that. It's geared to, basically, commute hour traffic five days a week.

I want to stress that Fisherman's Wharf is not only a tourist attraction, but it's an intensive area of commercial fish activity as well. What will be the impact on these businesses by the access differences between the various alternatives? We're hopeful that many of these concerns, and the others that we will submit in writing will be answered, but there is one thing we would like to request. Since the deadline is the end of the month, it's short on comment and we would like an extension of two weeks. We can give better testimony and get a better consensus of members during that time. Thank you.

CHAIRMAN PRAG: Thank you, Mr. Martin. Sue Hestor, representing San Franciscans for Reasonable Growth.

MS. HESTOR: Sue Hestor, H-e-s-t-o-r, counsel for San Franciscans for Reasonable Growth.

We're going to submit extensive written comments, but I'd like to go over some of the more critical problems in this EIR. Page 453 has employment trends and general development trends start on the previous page. This document picks up the projections and the errors of the Downtown Plan EIR in San Francisco. During that EIR comment period 1 we submitted extensive comments challenging the assumptions on growth rate that the Planning Department in San Francisco is making. We reiterate those challenges. The assumptions here are that the growth rate of downtown office development will drop dramatically from what is currently the rate of growth, and it will drop about seventy to eight percent, a decrease so that we will only have twenty to twenty-five percent of the development that we are having now over the next ten years, next fifteen years.

We think those assumptions are unwarranted, and additionally, there is a mixture here between the C3 district and city-wide development trends. To my knowledge the City Planning Department continues to use the 19 million, the 20 million square foot projection, basically for C3. 2 That ignores most of the area in which the I-280 programs will occur. They are in M-zoned areas and C2 zoned areas. To the extent the projections are city-wide the Planning Department should say so. To the extent the projections are merely C3, and we will leave that to be the case, the

amount of development is underestimated at least by one hundred percent. Those projections omit Mission Bay, they omit much of what is happening in the southern part of South of Market, and it omits as well development in the Van Ness corridor and in the Northeast Waterfront in the C2 zoned areas. Therefore, you have to approximately double the amount of development that is enumerated in this analysis.

3 The tables on 454 and 455 are confusing. I am always astounded to see the number of mining employees in San Francisco. Here we have mining employees, 6000. We have manufacturing employees, 34,000. The SIC categories don't make any sense for San Francisco. What is it in office jobs, because that is really what we're talking about. We don't have mining in San Francisco, we have Standard Oil in San Francisco, we have big mining companies with headquarters, like Utah. So these are silly. Talk about the office workforce, talk about the shift to office workforce and elimination of other categories of jobs, especially South of Market.

4 On page 574 there's a statement, "In order to maintain clear intersections, extensive manual traffic control of major freeway access corridors could be required." What that means is people out in the streets. One of the things I've been waiting for the Planning

Department in San Francisco in San Francisco to say is that an absolutely required mitigation measure is that a developer pay the costs of a Police Department Traffic Controller every day to keep the streets -- the traffic flowing so that we don't hit grid lock and that the F-level conditions we are experiencing and will be experiencing in a much greater manner in five to ten years are minimized. I think one of the required mitigation measures in here should be costing out of traffic controllers and the imposition on each new commercial developer of paying for their share of salaries, because otherwise I'm going to have to pay for them and you're going to have to pay for them. So let's talk about how many traffic controllers are we going to need, and presume a traffic controller is needed when you have D level congestion, especially a series of D level intersections in the transit corridors and in the traffic corridors.

On page V-108, 5-108, is a one and a half page summary that is one of the more ridiculous sections of this EIR. We have a growth inducing impact session. It is bizarre. I just listened to the testimony for Golden Gateway, I listened to the presentation of the slide show and the development potential issue is being ignored. You are saying, basically, the amount of growth will remain stable no matter what you do. I don't think that that is

the case when you remove the Embarcadero freeway. What the Embarcadero freeway does is it stifles development in a corridor south of Market, and it stifles development along the waterfront. That is why there is so much support from the business community for tearing it down in those areas. They see vast profits to be made from very intensive development. I think one of --

If you are going to tear down the Embarcadero freeway a required mitigation measure should be that a two block swathe be cut through the area and that the height limits be reduced to forty feet and the floor area ratios be reduced to four to one. Additionally, to the extent that anyone makes a profit from increased land values, that should go to the public. There should be confiscatory, I would even say, capture of that excess land value, because it's my money to be used to enrich Golden Gateway and Southern Pacific's lands.

CHAIRMAN PRAG: Ms. Hestor, your five minutes have expired. If you could just sum up.

MS. HESTOR: Okay. Finally, my personal concern, and it's personal, is that we really need to look seriously at the removal of Embarcadero freeway. If the removal of the Embarcadero freeway creates another wall of high rises south of Market, and another wall of high rises along the waterfront and more isolation from the water than is currently the case, I don't think it's a good idea. Thank you.

RESPONSE TO COMMENTATOR P-9

P-9.1: The projection of 91,260 employees is about equivalent to average growth rate of 5,700 employees per year. The Downtown Consultant's Report indicates that total employment in San Francisco grew at an average rate of 12,000 jobs per year between 1972 and 1981. The downtown area has about half of all jobs in the City, but it is likely that it experienced more than half of new job growth during this period. However, even if most of the growth occurred in the downtown, the rate projected in the DEIR would be considerably higher than the 20-25% of past growth suggested in the comment.

P-9.2 The economic study area for the I-280 study depicted at page IV-51 of the DEIR, incorporates land that is zoned for industrial, commercial and other uses. Included in the study area is the C-3 zoning district, where approximately 30 million square feet, or about 50% of San Francisco's office space is located. Development in the C-3 district alone would generate up to 91,260 new jobs between 1984 and 2000 according to the City's Downtown Plan EIR, accounting for up to 88% of total citywide employment growth during that time period. Within the economic study area, an additional 19.9 million square feet of net new office and retail space has been approved, is under construction or is under formal review by the Department of City Planning. As stated in the DEIR page IV-52, this figure does not include the proposed Mission Bay project.

Proposed cumulative development in the area south of Market Street (depicted in Figure IV-6, page IV-15 of the DEIR) would, as stated in the DEIR page IV-53, increase employment, primarily in office/administrative activities in the area, generating as many as 22,175 additional office-related jobs, increasing the 1981 figure of 158,595 total jobs in the area south of Market Street by approximately 14%. In addition, at full buildout the proposed Mission Bay project would generate an additional 21,000 jobs.

Proposed cumulative development in the area north of Market Street (depicted in Figure IV-8 at page IV-20 of the DEIR) would also increase employment in office/administrative activities, and add to the 1981 total of 122,305 employees in the area north of Market Street.

In summary, the land use and employment information presented at page IV-50 through IV-56 of the DEIR provide a detailed picture of the amount and type of employment in the economic study area in 1981. Major development and employment trends are also presented and discussed.

Total projected employment growth in San Francisco and the location of that growth (at least 88% of employment growth located within the economic study area), underscore the importance of the economic study area to the economy of the City. The general nature of this information provides a sufficient context to assess the impacts resulting from a Program Level EIR. As specific projects are identified for possible implementation, analyses of specific impacts can be undertaken.

This employment estimate was based on the best information available prior to the date of publication. Subsequent revisions to marginally increase or decrease the employment estimate would not alter the analysis presented in the DEIR in any appreciable manner.

P-9.3: The comment is correct that the SIC designation refers to the kinds of products made by the businesses, not the nature of the particular operation located in San Francisco. Citywide data on the distribution of employees by job category are not available.

P-9.4: The purpose of the I-280 study is to provide system-level information. The issue of traffic controllers, their cost and their location is a specific traffic mitigation measure that will be addressed in additional studies leading to specific traffic circulation plans and development impact analyses. A rough estimate is that approximately 10 to 20 traffic controllers may be needed on major freeway access routes during the p.m. peak period. Please see Response to Comment C-5.1 and Comment G-19.2 for further discussion.

P-9.5: Land use planning and regulation in the area south of Market Street is best articulated in the City and County of San Francisco's Downtown Plan, Northeast Waterfront Plan, Rincon Hill Plan, Rincon Point-South Beach Redevelopment Plan as well as in various supporting regulatory documents.

Areas contiguous to the Embarcadero Freeway are currently planned to intensify or change in use consistent with adopted plans and regulations regardless of the specific decisions made on the mode or form of transportation in the freeway corridor itself, for the corridor will remain a transportation corridor. While specific uses in areas contiguous to that corridor could be expected to reflect, in part, changes in the corridor, those uses would be subject to the provisions of the various plans and regulations for the area.

P-9.6: Analysis of the efficacy of specific mitigation measures for potential impacts resulting from Embarcadero Freeway removal at this point in the EIR process would have to be considered premature. The process of selecting alternatives has not yet been undertaken; whether or not the specific project of removing the freeway is incorporated into the alternative selected remains to be seen. The mitigation measures discussed, however, are noted, and will be incorporated into subsequent analysis of mitigation measures in the event that freeway removal is identified as a project for implementation.

P-9.7: Comment noted.

CHAIRMAN PRAG: Thank you, Ms. Hestor. David Kinsey, representing himself, wishes to speak and has the following statement read into the record. He wishes to express approval of Rail Transportation Plan 5-A.

MR. KINSEY: Hello. I'm David Kinsey. Plan 5-A, actually, I think that probably came the closest that I could see. I would take any of the three over here. First, I think I would just like to express myself to all the committees and wards, whoever are going to be making the decisions on all these plans here, that my opinion is that rail transportation is the most important in San Francisco in that in rail transportation it can only work if all your transportation stations have a connection. I know that as has been the case in San Francisco, there are a few rail and transportation systems, but nothing seems to connect. So if you're trying to get somewhere, you find yourself isolated in one area, and there's no way you can connect to the other station. The idea that the Caltrain continue closer to downtown is, I think, essential. They should just do away with the 4th Street Depot. It has never served anything there. The idea that the Municipal Subway continue down along 3rd Street to serve the Caltrain Depot, I think has got to be the most absurd thing. If I could say that if anyone has ridden the Municipal Subway they know that it cannot even

function right now just on one line. If you add another line to the Municipal Subway you're going to be -- it's going to be just like sitting on the Bayshore Freeway. You're not going to go anywhere. Right now the people running that subway system have a lot to learn. It's brand new, but they have a lot to learn in running that subway system. So any additional lines to that would just create pure chaos.

The Transbay Terminal is a station. It was a train station, it should continue to be a train station. It was electric at one time. I heard tonight that someone mentioned there are no diesel trains running underground. Well, I don't know if that person has ever been in Penn Station in New York. I don't know if he's ever been in Union Station in Chicago, Grand Central Station in New York, but all stations all contain underground diesel trains.

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The removal of the Embarcadero freeway -- I think it's a good idea. There's a lot of debate still going on on that. The reason I would like to see it removed is that I think you could create a wide boulevard, the Embarcadero. You could create -- the Waterfront is the most underused, the Embarcadero is the most underused road that there is now in the City. They have plans for six lanes in that. That's, I think, could easily accommodate six lanes. If

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you've ever stood on that street and looked at it, I count you could easily get eight lanes, plus median in there. The Embarcadero freeway right now, you have two lanes running on that. You have, well, okay, let's call four lanes. You have two, two lanes running one way and two lanes running the other way. And then you narrow down to one lane as you try to get onto the bridge. If you make the roadway there you could get six lanes easily, plus streetcars. The idea of streetcars running to Fort Mason, again connecting. Connect to the Ferry Building, and then cross Justin Herman Plaza. You connect to the Transbay Terminal, and you create a tranportation system that connects itself, something that works, something that when a person is trying to get from place A to place B he can do it.

Right now, I would clearly like to say that I doubt if any of the members on the Metropolitan, the MTC Board or any of these boards that are making the decisions for this. I doubt, and I would certainly take a rebuttal on that, but I doubt if any of them ride public transportation on the rail. I doubt if they ride the train, I doubt if they ride the rapid transit subway, and I certainly doubt if they ride the Municipal Subway, because if they did, if they did, I think you would find a lot of changes and they'd come a lot sooner. So, again I think I should just sum up.

I'd like to leave you with just a thought, and that's, when you think of some of the great cities of the world, and if you think of London, or Paris, or New York, or Tokyo, the thing that makes these cities great is that they run, and they run by trains. The trains that get people to work, from work, and around the city where they want to go. And I think that we have a chance now within this city to create a rail system, diesel trains and a subway. And that's just my opinion as a citizen here that lives here and works here, and I appreciate coming to this meeting, thank you.

CHAIRMAN PRAG: Thank you, Mr. Kinsey. Peter Albert, representing himself, wishes to speak and have the following statement read into the record -- you do not want it read into the record.

MR. ALBERT: No, I'll have that read into the record and I'll give a shorter version of it.

CHAIRMAN PRAG: Well, then why don't you identify yourself, please, and go ahead.

MR. ALBERT: Okay. My name is Peter Albert, and I'm just representing myself, and I'm a very active pedestrian in San Francisco, because I don't rely on cars to get around. And I wish to reemphasize the importance of the pedestrian environment in downtown San Francisco. And especially in front of the Ferry Building.

RESPONSE TO COMMENTATOR P-10

P-10.1: Comment noted.

P-10.2: Comment noted.

P-10.3: The Muni Metro extension is proposed to serve the transit needs in the Bayshore corridor. Extension to the existing SP Depot is the first phase of a long range plan for this extension.

P-10.4: Comment noted. Please note that diesel trains are not operated underground at Penn Station in New York; However, Union Station in Chicago does operate diesels under an air rights development complex with specially designed ventilation.

P-10.5: Comment noted. Please see Response to Comment G-7.12 for discussion on number of lanes for the Embarcadero surface roadway.

P-10.6: Comment noted. The F-Line alignment along Market Street corridor is the subject of a separate study.

P-10.7: Comments noted.

I'd like to leave you with just a thought, and that's, when you think of some of the great cities of the world, and if you think of London, or Paris, or New York, or Tokyo, the thing that makes these cities great is that they run, and they run by trains. The trains that get people to work, from work, and around the city where they want to go. And I think that we have a chance now within this city to create a rail system, diesel trains and a subway. And that's just my opinion as a citizen here that lives here and works here, and I appreciate coming to this meeting, thank you.

CHAIRMAN PRAG: Thank you, Mr. Kinsey. Peter Albert, representing himself, wishes to speak and have the following statement read into the record -- you do not want it read into the record.

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And historically, the foot of Market Street has been the transit hub of San Francisco for the East Bay. And I'm glad that the EIR has recognized this tradition, and I'm glad that it recognizes how the Embarcadero Freeway has intruded on this environment and has aesthetically and functionally severed the City from the Bay. And I think that using the Ferry system that is something that is planning to be upgraded with talk of the hovercrafts, and using that outlet, people who want to enjoy downtown San Francisco, and its bay, it's imperative to preserve this delicate and comfortable environment that's for pedestrians and that distinguishes this City from Los Angeles and San Jose, cities that have relied upon the freeways in the 1950s, and have locked themselves into a trap right now with air pollution, and with lack of a pedestrian environment, thank you.

CHAIRMAN PRAG: Thank you, Mr. Albert. Did you want this statement read into the record -- okay, fine, then I will do so:

"The pedestrian environment is the characteristic environment of northeast San Francisco, and preserving and enhancing that environment are key issues."

I'm sorry, I can't read all this -- it's something to the effect that the Embarcadero extensions would -- and then the Embarcadero extensions then would continue to

intrude on this delicate quality environment, whereas their removals are advancements in esthetics and liveability. Meet traffic congestion, caused by these removals, with stepped up transit service, local and Peninsula, as transit also serves to enhance concentrated pedestrian activity. I see Alternative IV as the strongest.

Edward Van Egri, representing the Russian Hill Improvement Association.

MR. VAN EGRI: I'm Edward Van Egri, director of the Russian Hill Improvement Association. I'm speaking only to items, or Alternatives V and V-A, which include a TSM item of making Bay Street and Northpoint one way streets between Columbus Avenue and Van Ness. It's recognized that these are already heavily trafficked streets, but still basically residential in character. We feel that making these into one way traffic corridors would be so disruptive to the lower part of Russian Hill and that neighborhood that we would like to see that possibility scratched from the EIR, or if that is not to be done, we would certainly then take the opportunity of objecting very strongly to that one way plan for those two streets. Thank you.

CHAIRMAN PRAG: Thank you, Mr. Van Egri. Amos Roos, representing himself. You indicate you have a two page statement.

RESPONSE TO COMMENTATOR P-11

P-11.1: Comments noted.

P-11.2: Comment noted.

intrude on this delicate quality environment, whereas their removals are advancements in esthetics and liveability. Meet traffic congestion, caused by these removals, with stepped up transit service, local and Peninsula, as transit also serves to enhance concentrated pedestrian activity. I see Alternative IV as the strongest.

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CHAIRMAN PRAG: Thank you, Mr. Van Egri. Amos Roos, representing himself. You indicate you have a two page statement.

RESPONSE TO COMMENTATOR P-12

P-12.1: Comment noted. Please see Response to Comment G-6.1 which is the same comment from the Russian Hill Improvement Association.

MR. ROOS: Correct. My name is Amos Roos. I'd like to have this incorporated in the record. No need to read it.

CHAIRMAN PRAG: Thank you.

MR. ROOS: And I'd like to ask a couple of questions of clarification of the report, as it stands. First there is reference to Muni Metro/E-line, and one of these graphics shows two different colors for those two which run together from 4th and Townsend toward Market Street. It's not at all clear to me what is the difference between Muni Metro and E-line. I think that perhaps the intention of the writers of the report was that Muni Metro refers to the modern vehicles that have been built in the last decade and E-line refers to the older vehicles. But it may also be that Muni Metro means subway and E-line means surface. The terminology needs clarification. Would you care to explain,-- is that all right, Mr. Chairman.

MR. SAYRE: The Muni Metro is a proposal to extend the Muni Metro from the Embarcadero Station to 4th and Townsend using existing light rail vehicles. The E-line proposal is a rail system that would run from Fort Mason, along the Embarcadero. It would join and share tracks with the Muni Metro extension where they come together and continue on to 4th and Townsend.

MR. ROOS: But to say that the two would join and

share tracks makes it, does not make clear what is the difference between the two. That's my problem. And I take it that it's in the vehicle, I think that's what you're telling me. And I'd like to see that explicit in the report in some kind of a definitions section.

MR. SAYRE: The type of vehicle to be selected for the E-line has not been decided yet. It could be a vintage street car or LR -- light rail vehicles, like the Muni Metro, or the existing PCC cars that used to run up Market Street.

MR. ROOS: So then if it wound up being light rail vehicles like those in the current subway, then actually there would be no difference whatsover between the E-line and the Muni Metro, because they would be identical in every respect except that one would fork one way and the other would fork the other way at Market and Embarcadero.

MR. SAYRE: In that case they would use the same type vehicles, yes.

MR. ROOS: Okay, second question relates again to rail lines. I did not read the report in absolute detail, however, I do not recollect having seen any discussion in the written report of cable car extensions. On the graphic up there, Alternative V, and one of these on my right, there was an illustration of a California Avenue Cable Car being extended from the corner of, I guess it's

Robert Frost Plaza, California and Market, down to Justin Herman Plaza or to the Ferry Building. And I wonder if that is part of the alternative. And if so, if I simply overlooked the text.

MR. SAYRE: Mr. Kudlick, would you respond to that, please.

MR. KUDLICK: I'll have to check my recollection, it's been some time now. But to the best of my recollection the cable car extension is not part of this alternative.

MR. ROOS: So the graphics on the walls, then, are incorrect.

MR. KUDLICK: If it's shown as an extension on the wall it is incorrect.

MR. ROOS: Thank you. A similar question, or perhaps the flip side of a question is whether there's any consideration to extending the Mason Street line down Taylor beyond its present terminus? Which would provide better service to the Fisherman's Wharf merchants who spoke earlier.

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MR. SAYRE : That extension is not part of the study.

MR. ROOS: Thank you. Another question I have relates to the proposal to leave the Embarcadero freeway up and demolish six particular columns at the south end

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of it. I think it would be helpful to the reader, it certainly would be to me to have an itsy bitsy sketch in the report which would indicate which six columns those were, so that I could go walking in that area and visualize what the proposal was.

The other issues that I wish to address are in my written comments. What I'd like to do is just for the benefit of those here, summarize them very briefly. I wonder if Muni couldn't schedule its trains to meet the PCS trains, the commute trains, instead of just running on a fixed headway. And if that wouldn't provide better connection service between the Peninsula Commute line and downtown. I don't understand why it makes sense to have both a streetcar line and a SP type line from 4th and Townsend or 3rd and Townsend to downtown. It seems to me either one of those might make sense, but building them both seems to me redundant. I think that the idea of PCS extension with grade crossings is an abominable idea, and I think I heard you saying that it's been rejected. I'm delighted to hear it. There's been two recent proposals for relocating the PCS terminal which are different from those in the draft EIR. One is Mayor Feinstein's agreement with Santa Fe SP to move it back and the other is Caltrans to move it to a Transbay Terminal, and I wonder if it would be possible in the EIR to review how, at least in brief terms how either

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of those might impact the conclusions of the report if there would be any impact.

And one of the proposals in the -- one particular alternative, Alternative Three, calls for a grand union junction of four street car lines in Stewart, near Howard, and I'd like to suggest that that's a terrible idea, for reasons which can be seen in the shadow of the old Mint at Duboce and Church. And finally, I think that the I-280 stub is a reminder of the mistakes that have been made in this city, and we all know that everybody makes mistakes, but I would urge that whatever is not used be demolished rather than left as an expensive parking lot.

CHAIRMAN PRAG: Thank you, Mr. Roos. Let the record indicate that Mr. Roos has submitted a 2-page document entitled "Questions and Comments." It bears his name and street address in San Francisco. It's entitled on the draft Environmental Impact Report for the I-280 Transfer Concept Program. It's undated, but it will be taken in as part of the record and considered.

H. Grant Dehart, if I'm pronouncing that correctly, representing the San Francisco Chapter of the AIA; and I would ask you to identify what that is, and the Foundation for San Francisco's Architectural Heritage.

MR. DEHART: Yes, I'm representing two organizations.

RESPONSE TO COMMENTATOR P-13

P-13.1: Please see responses provided by Mr. Sayre at the hearing and shown on the hearing transcript.

P-13.2: Cable car extension is not proposed in any of the alternatives. The graphics on the wall show the existing cable car lines in the study area.

P-13.3: The extension of the Mason Street line down Taylor beyond its present terminus is not part of this study.

P-13.4: Plans showing the removal of the Embarcadero Freeway columns are included in Working Paper 2.2.1a, which supports the DEIR.

P-13.5: Please see Responses to Comment Letter I-12 from the same Commentator.

CHAIRMAN PRAG: Would you please state --

MR. DEHART: My name is Grant DeHart. I'm representing two organization statements. The San Francisco Chapter of the American Institute of Architects, based on a review by the Urban Design Committee of this chapter, and secondly, a staff position of the Foundation for San Francisco's Architectural Heritage.

The first -- the AIA has reviewed the urban design evaluations contained within the draft EIR and strongly recommends the removal of the Embarcadero freeway and the reconstruction of the Embarcadero surface roadway.

In our review of the alternatives presented we have identified an alternative which has not been included in the draft EIR and which we feel deserves consideration. This alternative deals with the removal of the Embarcadero freeway and the construction of the Embarcadero surface roadway, specifically as it passes in front of the Ferry Building. While the removal of the Embarcadero freeway, as proposed in Alternatives III through V-A, would create new views to the waterfront we do not feel that the alternatives go far enough in establishing the high level of urban design character which is appropriate for one of the most important waterfront sites in the city. The site where Market Street, the major east-west circulation access meets the Ferry Building, and the most important building in

the Northeast Waterfront. It is our opinion that the Embarcadero Surface Roadway should be depressed in front of the Ferry Building and that a major pedestrian plaza be constructed. This alternative would vastly improve the public access as well as the visual linkage to the Waterfront. As a grand civic plaza it would cater to the growing demand for the public open space in that area as well as serving as the important physical transition from Market Street corridor to the Waterfront. It should be mentioned that the idea of a major plaza at the foot of Market Street is not an original concept, but was first suggested by Wells Polk in 1897. We will provide preliminary sketches of a basic plaza scheme at the foot of Market Street. We would like to emphasize that there are several design options available for implementing this concept. Just as various alternatives have been suggested for other components within the transportation package, we feel that the options should be evaluated for the treatment of the Embarcadero surface roadway.

The Market Street Ferry Building site is of such importance that due consideration must be given to solving the pedestrian vehicular conflict in a sensitive way, and they go on to include some suggestions for how the costs of such a scheme might be handled, which I'll submit for the record.

For the Heritage position, our staff has worked with the study team to help identify historic and architectural resources in the study area and to review and comment on the Historic Resources Property Survey Report. We would like to commend the environmental analysis branch of District IV and their consultants for their thorough analysis. But we would also point out that the omission of Pier Bulkhead 42 as a National Registry eligible historic resource identified as eligible by the National Park Service, and many other bulkhead buildings, which of the style of Pier 42, which we would believe to be eligible for the National Register. Several similar to those in the design, of the design of Pier 1, 3 and 5, along the waterfront in both directions would appear to be eligible for the National Register. The DEIR should identify these resources and discuss the impacts of the alternatives after consultation with the National Register Staff of the Park Service and the State Historic Preservation Officer. We think that these impacts would generally be the same as those for the Ferry Building and pier bulkheads one, three and five. The Heritage Staff concurs with the reports findings that alternatives III, IV, and IV-A would have the best balance between the positive impacts upon the historic resources through removal of the Embarcadero Expressway and surface improvements and minimum adverse impacts on these resources. We

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might disagree with the E-line surface extension in the median of Townsend Street as proposed in Alternative III would not have adverse impacts on the historic district. We believe that they might. We're aware that the property owners along Townsend Street are seeking a special assessment district to provide landscaping improvements in this specific area, which may not be compatible with the surface rail line. Considering all costs, traffic implications and other information in the Environmental Impact Report it appears that Alternative IV-A would have the maximum benefits for historic and architectural resources, and the fewest adverse impacts, and the cost and costs that are more reasonable than most of the other alternatives. Thank you.

CHAIRMAN PRAG: Thank you, Mr. DeHart. I have a two page document prepared on American Institute of Architects, San Francisco Chapter letterhead. It's entitled AIA Policy Statement, I-280 Transfer Concept Program, Environmental Impact Report Draft. It is unsigned. I will take this in as part of the record.

Robert Tandler, representing various property owners, from the Law Offices of Harold Dobbs.

MR. TANDLER: Mr. Prag, Mr. President, Members of the Commission, Commission Staff, Mr. Bachtold, Members of Caltrans, I'm very encouraged to see the Department of

RESPONSE TO COMMENTATOR P-14

P-14.1: The testimony is a reading of the written comments submitted by AIA, Comment Letter G-21. Please see Responses to Comment Letter G-21.

P-14.2: Figure VI-1, Historic Resources, on page VI-3 of the DEIR shows those places within the study area that are on the National Register. It also shows those places that are eligible for inclusion on the National Register. Piers 1, 3 and 5 are deemed "Potentially Eligible" for the National Register. Pier 42 is outside the Area of Potential Environmental Impact (APEI) of the proposed alternatives; therefore its eligibility was not addressed in the DEIR. Please see the APEI maps in Sec. IX of this Addendum. However, the State Historic Preservation Officer has indicated that Pier 42 (not shown on Figure VI-1) is not on any of the National Register eligibility lists (H. Kreutzberg, Architectural Historian, telephone communication, February 5, 1985). As noted in the DEIR, final determinations on potentially eligible resources are made in consultation with the State Historic Preservation Officer and the keeper of the National Register. Impacts on the resources shown on Figure VI-1 are listed in Table VI-1, Historic Resources Impacts Summary, pages VI-5 and VI-6 of the DEIR. Piers 1, 3 and 5 would not be impacted under Alternatives I or VI. Beneficial impacts would result from Alternatives II, III, IV, IVA, V and VA.

might disagree with the E-line surface extension in the median of Townsend Street as proposed in Alternative III would not have adverse impacts on the historic district. We believe that they might. We're aware that the property owners along Townsend Street are seeking a special assessment district to provide landscaping improvements in this specific area, which may not be compatible with the surface rail line. Considering all costs, traffic implications and other information in the Environmental Impact Report it appears that Alternative IV-A would have the maximum benefits for historic and architectural resources, and the fewest adverse impacts, and the cost and costs that are more reasonable than most of the other alternatives. Thank you.

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Robert Tandler, representing various property owners, from the Law Offices of Harold Dobbs.

MR. TANDLER: Mr. Prag, Mr. President, Members of the Commission, Commission Staff, Mr. Bachtold, Members of Caltrans, I'm very encouraged to see the Department of

City Planning and the Planning Commission here tonight. Because I think it is an indication of what is lacking in the Environmental Impact Report that we are viewing tonight, or discussing this evening. This Environmental Impact Report is a terrific transportation document. I don't think it sufficiently addresses the impact on the City of San Francisco as to what is being proposed, and the impact on property owners in the districts and in the areas that these various projects are being considered. And I think that we are fortunate that there will be a coordination. I hope there will be further coordination between the Department of City Planning and Caltrans as to these proposals, because I think that these elements are nonaddressed. I'm speaking, specifically, of the elements of jobs, the affect on businesses, the effect on the economics of the various districts, where these projects are proposed to be built, what will happen to the the businesses and industries that are currently existing in these districts where these projects are proposed to be built, who's going to pay to relocate those businesses and industries, who is going to provide jobs for the people who will be dislocated from their existing jobs when these projects are built. I don't think that these are addressed in the Draft Environmental Impact Report.

I also don't think that the Environmental Impact

Report sufficiently addresses the economic and legal rights of property owners in this area. I understand that there are issues raised about recompensing people for acquiring their properties. The figures I have seen thus far this evening in my humble opinion do not come anywhere near proper compensation for property owners where land is to be acquired, regardless of the process.

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I don't see proposals in the Environmental Impact Report or in the projects that I've reviewed that coordinate these projects with the property owners. I don't see committees being formed to address the legitimate concerns, needs and rights of property owners in these districts. I don't know how property owners are being contacted other than in this form, which certainly, they appreciate. I don't think this form is sufficient to address those needs and rights.

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Finally, I think if you look at a document and an environmental impact report like the downtown plan of San Francisco and the environmental impact report which covers the downtown plan, and compare it to the environmental impact report which we are discussing this evening, I think you can see very, very vividly the lack of attention to these different elements and concerns which need to be addressed. As I said, this is a terrific transportation document. I think there are many, many more issues that

need attention that I am sure will be addressed as these plans are finalized and determined. Thank you.

CHAIRMAN PRAG: Thank you, Mr. Tandler. Jeffrey Heller, representing Heller and, I'm sorry, it looks like Leek, correct me if I'm wrong, Mr. Heller, architects.

MR. HELLER: You don't have to be sorry, that's correct.

CHAIRMAN PRAG: All right. Please identify -- and apparently, some other organizations, would you please --

MR. HELLER: I represent, in addition to ourselves, several other groups and represent the concerns of those groups, notably Fritzi of California, Anvil, International Properties, Montgomery Capital Corporation, Forest City, Dillon, and General Atlantic Development Company. The concerns I will reflect specifically relate to Alternative V-A, and it relates to a basically two points of inadequacy in the document. The first is a complete lack of disclosure of the full aspects of the Caltrains extension, especially in terms of the terminal, itself.

The proposed terminal would be something, perhaps just short of a quarter of a mile long in the middle of the downtown and the Engineering studies which are presently being contemplated have not been adequately in any way addressed in this document and simply have to be, because there are several questions which are raised in relationship

RESPONSE TO COMMENTATOR P-15

P-15.1: Transportation is only one of the many impact areas addressed in the DEIR. The impacts on affected property owners were addressed in Sec. VA and Sec. VB of the DEIR. Working Paper 2.2.4 contains more detailed information on the location, number and type of properties which might be affected by the proposed transportation improvements in the corridor. However, impacts and mitigations cannot be addressed on individual property owner basis at this time because specific design details of individual projects have not been developed. These will be addressed when specific designs for selected projects are proposed for project-level environmental clearance.

P-15.2: Compensation for properties located within the right-of-way of any of the alternatives would be paid from project funds; however, this compensation would not extend to businesses leasing space in these properties. The DEIR indicates that some of these businesses may experience difficulty in locating adequate space at an affordable cost.

P-15.3 The specific level of compensation would need to be determined at the time a specific alternative has been approved and funded.

P-15.4: The I-280 study has a strong citizens participation and public involvement program which includes public scoping meeting, study news letters, community workshops, interviews with community leaders and group representatives, media contacts, and the public hearing. Through these means, relevant information has been disseminated to the public and feedback from the public have been sought. Direct contacts with individual property owners are premature at this time as projects have not been designed in detail.

need attention that I am sure will be addressed as these plans are finalized and determined. Thank you.

CHAIRMAN PRAG: Thank you, Mr. Tandler. Jeffrey Heller, representing Heller and, I'm sorry, it looks like Leek, correct me if I'm wrong, Mr. Heller, architects.

MR. HELLER: You don't have to be sorry, that's correct.

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The proposed terminal would be something, perhaps just short of a quarter of a mile long in the middle of the downtown and the Engineering studies which are presently being contemplated have not been adequately in any way addressed in this document and simply have to be, because there are several questions which are raised in relationship

to the property owners and the lands involved and how those interrelationships might take place and how the final plan or the spectrum of plans proposed for this area would relate to the Downtown Plan, itself.

Secondly, the document doesn't discuss adequately the timeframe implications of the proposal V-A. Specifically, that if the Caltrain's extension does take place, and I don't disagree at all conceptually with the proposal in V-A, but the timeframe of that proposal would be substantially at odds with other sections of this report, for example, the E-line and the proposed projects in South Beach and so on. I believe the timeframe for the Caltrain's extension would extend many years beyond proposed development of the E-line and other improvements that are more directly city related. And I think that issues of corresponding rights of ways or the ability to have one right of way in lieu of another until the second can be implemented have to be fully explored before this adequacy in the document.

Finally, I'd just like to agree with Grant DeHart's general comment that in the overview in terms of urban and architectural and city benefit and city resource benefit that perhaps as a personal note, Alternative IV-A might be the best. Thank you.

CHAIRMAN PRAG: Mr. Heller, do you have a one-

sentence comment that you indicated you want read in.

MR. HELLER: I don't think that's necessary, thank you.

CHAIRMAN PRAG: All right, fine. Thank you, very much.

I've gone through all the cards that have been submitted to me during the recess. If there are any other individuals who wish to speak I'd ask them to fill out a card at this time and bring it forward to me at the podium.

I have a card here from Omar Chatty, if I'm pronouncing that correctly, and forgive me Mr. Chatty, I had a little difficulty, at least, reading your handwriting here, but I'll do my best. You have several questions you'd like answered if possible, and several comments or statements you'd like read into the record.

I'll read the questions. You also indicate you wish to speak, is that correct? Let me read your statement into the record, first, if I may:

"I want to see I-280 extended to US 101 and I-80 Bay Bridge with minimal environmental impact. That alternative should be readded to this EIR. It's not a satisfactory EIR until a true transit-freeway comparison is considered. Furthermore, I-280 should be studied to I-80, US 101 with an exclusive busway, carpool guideway. Alternatives II or VI or minimally acceptable, except that

RESPONSE TO COMMENTATOR P-16

P-16.1: Alternative VA describes the concept of a subway extension of the Peninsula Commute Service line to the Transbay Terminal site. This concept is subject to refinements and modifications during the project design development phase should the concept be selected for implementation. The proposed PCS terminal's relationship with, and impact on the property owners in the area will be addressed in sufficient detail and become the basis for necessary refinements and modifications of the proposed concept.

P-16.2: The construction time period was estimated for each proposed improvement project included in the alternatives (please see Working Paper 2.2.9: Construction Impacts). The implementation timeframe of a project cannot be estimated as it will depend upon funding availability and the implementation priority assigned to the selected projects. However, the implementation timeframe of the PCS extension will not affect the right-of-way requirement of Muni Metro extension or E-Line in Alternative VA. It will affect only the timeframe of accompanying street improvements made possible by the PCS extension. It was recognized that the timeframe of the PCS extension could extend beyond the proposed housing development in the South Beach area and would impact this development during construction. This potential impact was addressed in the DEIR.

P-16.3: Comment noted.

sentence comment that you indicated you want read in.

MR. HELLER: I don't think that's necessary, thank you.

CHAIRMAN PRAG: All right, fine. Thank you, very much.

I've gone through all the cards that have been submitted to me during the recess. If there are any other individuals who wish to speak I'd ask them to fill out a card at this time and bring it forward to me at the podium.

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I'll read the questions. You also indicate you wish to speak, is that correct? Let me read your statement into the record, first, if I may:

"I want to see I-280 extended to US 101 and I-80 Bay Bridge with minimal environmental impact. That alternative should be readded to this EIR. It's not a satisfactory EIR until a true transit-freeway comparison is considered. Furthermore, I-280 should be studied to I-80, US 101 with an exclusive busway, carpool guideway. Alternatives II or VI or minimally acceptable, except that

we oppose the EIR unless it includes I-280 to I-80, US 101 as freeway."

I might indicate that Mr. Chatty has indicated that he represents, himself, an organization, People for Efficient Transportation. You've indicated you have one or two questions which I'll take the liberty of asking.

"Is if possible to still obtain approval of the I-280 extension to US 101 Interstate-80?"

Is this a question that you could answer.

MR. SAYRE: I think that we'd prefer to respond to that in writing.

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CHAIRMAN PRAG: All right, and the second of two questions: "What would it take to add that alternative to this EIR?"

MR. SAYRE: I'd give the same answer. We'll respond to that in writing.

CHAIRMAN PRAG: All right, we do have an address here for Mr. Chatty in Morgan Hill, and you'll be able to contact him there. Mr. Chatty, you wish to make a statement also, is that correct? All right, please come forward and identify yourself for the record.

MR. CHATTY: My name is Omar Chatty and I live at 18216A Hale Avenue in Morgan Hill, and I drove up here because I think it's important that the perspective of people who commute from the Peninsula and people who commute

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from the South Bay, and also people who visit the area as the Fisherman's Wharf representative stated, their view should be considered. And I think that the interests of San Francisco citizens as well as commuters and visitors would be well served by readding the Interstate 280 connection to I-80. I'm -- the reason I say 101 is I'm not sure what that section of highway is, where it was originally planned to tie in. Okay? I'm not addressing it beyond towards Fisherman's Wharf.

My concern is that we don't have any kind of -- it's a fatal flaw to ignore that option in this kind of an analysis, to me, and to our group. The concern is that there's no realistic assessment of how many traf- how many vehicles are taken off the city streets, the impact on smog, on pedestrian safety, on vehicular safety and on transit improvements by removing cross-traffic cars that will be otherwise on a freeway where there's a transportation freeway system network, where you have a link, where cars don't have to get off the freeway unless they get off at their specific off ramp, addressing near their workplace or their place where they're visiting.

So the concern that we have in the South Bay, especially, is that we get a lot of the smog down there that is generated up here by people trying to cross the Bay Bridge every morning and people trying to get into this

city, because you have one, basically a six lane freeway going to this city on an east-west direction, and if 280 were to be connected it would do a great deal to remove traffic off the city streets, and I think that's got to be considered, as well as the reduced accident rates and the other things I mentioned.

I strongly support what Mrs. Hestor said relating to development in the future. I think her comments are very perceptive, and so just to reiterate, when I talk about busway-guideway, what our group advocates is one lane being dedicated to carpoolers and busway people as a guide-way, separated by general, from general traffic as (Shirley Highway) is, or the El Monte Busway.

So, again, I think that we're, it's a very serious flaw in this EIR to ignore connecting that roadway. To give you an example, a hundred and thirty thousand cars use 280 where it splits with 101. And at the end of 280 right now, where it comes out at 3rd -- 4th Street there are only fifty-five thousand. That means that leaves roughly, well, a whole lot of cars that are either stuck on 101 going into this city or driving through the city streets congesting them. So I think that's a very serious impact, that's my concern.

MR. ROSENBLATT: Thank you, Mr. Chatty. Mr. Chatty has also asked that he be added to the mailing list

and that his organization, he represents People for Efficient Transportation, be added, and he has a mailing address for them,also. All right.

Now is there anyone else who wishes to speak tonight?

Before we conclude this I just wanted to say on behalf of the Planning Commission, the Planning Department, I wanted to thank Mr. Prag for conducting this meeting on behalf of all of us here very effectively, thank you. And to thank the Caltrans people, Mr. Sayre and his people for a very well-expressed and clear presentation, and Mr. Bachtold and all of his staff for your cooperation through all of what has led up to this meeting with the staff and the city people. And I'd like to thank you.

CHAIRMAN PRAG: Thank you, Mr. Rosenblatt. I'd like to remind the audience that the record will remain open through November 30, 1984. If you wish to submit written comments you may do so through that date. Please address them to W.B. Chastain at Caltrans and the P.O. Box is 7310 in San Francisco 94120. I'd like to thank the Commission and Caltrans; also the Marina Middleschool for allowing us to use their auditorium. And to thank you, the public for coming out on this rainy night. Thank you and good night.

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RESPONSE TO COMMENTATOR P-17

P-17.1: The Commentator's statement was made on Comment Card G-5. Please see Response to Comment G-5.2.

P-17.2: The Commentator's questions were also stated on Comment Card G-5. Please see Response to Comment G-5.2.

P-17.3: Comments noted. As explained in Responses to Comment G-5.1 and G-5.2, the study of the originally planned I-280/I-80 connection is not within the scope of this DEIR.

P-17.4: The Commentator and the group he represents are added to the mailing list, as requested.

IX. REVISIONS TO DRAFT ENVIRONMENTAL IMPACT REPORT

DEIR Page	Revisions

I-13 The following paragraph is inserted between the first and second paragraph:

> Consistent with the purposes of the I-280 TCP study, impacts and mitigations are discussed in Chapter V at the system level. The discussion addresses the the overall impacts of each alternative system improvement concept on the study corridor, in contrast to the discrete effects of individual system components or projects. Individual projects selected for implementation are subject to detailed design development; and the proposed project designs will require further environmental review and clearance. Project-level details will be available through design development for determination of project-level impacts and mitigations.

I-14 The last sentence of the second full paragraph is revised as following:

> Alternative V would adversely affect eight resources, Alternative VI would adversely affect seven resources, Alternative VA would adversely affect nine resources, including the demolition of two buildings eligible for nomination to the National Register.

The following paragraph is inserted between the third and fourth full paragraph:

> In addition, a City Historic District, called the Northeast Waterfront Historic District, has subsequently been identified as potentially eligible for the National Register. One block of this potential Historic District overlaps the APEI for the project at the corner of Broadway and Battery Street. The only effect on this District by any alternative will be the removal of the Embarcadero Freeway Broadway off-ramp (Alternatives III-VA). The removal of the off-ramp is considered a beneficial effect, since it will restore the District to its original setting.

III-10 On line 11 of the second full paragraph, the words "owned by" are replaced by "under long-term lease to". The following sentence is inserted before the last sentence of this paragraph: "This area is within the South Beach sub area of the Rincon Point - South Beach Redevelopment Project area, in which the triangular parcel referred to is planned for residential uses combined with neighborhood commerical."

III-39 The graphic symbol for Embarcadero surface road improvements is extended from Stockton Street to Powell Street.

DEIR Page	Revisions
III-55	The number of "arrows" shown on the new off-ramp from the Embarcadero Freeway is corrected from four to three.
IV-6,7	The land use designations shown for the Embarcadero Center Buildings are revised to "O/RE", indicating office use as well as retail, restaurant, etc.
IV-8,9	The land use designations for areas labeled as "5", "6" and "7" are changed to "W", indicating warehouse and wholesale trade uses.
IV-18	On line 6 of the first paragraph, the word "units" is changed to "rooms".
IV-19	On line 3 of the fourth paragraph, "1983" is changed to "1984".
IV-20	Figure IV-8 is replaced by a revised version of this map shown on the following page of this Addendum.
IV-32	On line 2 of the second paragraph, "Nob Hill," is inserted between "Downtown" and "Chinatown".
IV-34	The following sentences are added to the first paragraph: At the upper portion of the China Basin channel, the Mission Creek Harbor neighborhood harbors twenty houseboats and thirty-five other craft under lease with the Port of San Francisco and permit from the San Francisco Bay Conservation and Development Commission. This is an active, cohesive community and a member of the Coalition of San Francisco Neighborhoods.
IV-93	In the fourth full paragraph, the following sentence is inserted between the third and fourth sentences: (The coliform content of the channel has reduced by several orders of magnitude since 1979 as a result of a reduced number of uncontrolled wet weather discharges and the startup of the Channel Pumping Station.)



CUMULATIVE DEVELOPMENT NORTH OF MARKET

SCALE 0 400 800 1600 FEET

*Additional information on these projects is on file with the Department of City Planning 450 McAllister St., 5th Floor, and is available for public review.

March, 1984

IV-8

DEIR Page	Revisions
V-2	The following paragraph is inserted between the third and fourth paragraph: Consistent with the purposes of the I-280 TCP study, impacts and mitigations are discussed in Chapter V at the system level. The discussion addresses the the overall impacts of each alternative system improvement concept on the study corridor, in contrast to the discrete effects of individual system components or projects. Individual projects selected for implementation are subject to detailed design development; and the proposed project designs will require further environmental review and clearance. Project-level details will be available through design development for determination of project-level impacts and mitigations.
V-5	On Table V-1, the net developable land for Alternative III in the South Beach/Rincon Hill segment is changed from "-30" to "-3", and the total developable land for Alternative III is changed from "-172" to "-145".
V-33	The following sentence is inserted before the last sentence of the second paragraph: "Table V-5a presents the annual funding requirements for each alternative excluding the Peninsula Commute Service element."
Between V-34 and V-35	Table V-5a, shown on the following page of this Addendum, is inserted into the DEIR between pages V-34 and V-35.
V-74	The next to last sentence of the third paragraph is revised as following: "In order to maintain clear intersections manual traffic control would be required at 10-20 intersections, depending on the alternatives, along major freeway access corridors." The following sentence is added to the end of the third paragraph: "Should cross street traffic be blocked travel times and delays to transit and other vehicles could increase significantly over that projected."
V-129	The following sentence is added to the last paragraph: "Where found to be necessary, resiliently mounted tracks should be considered to mitigate the vibration impact of streetcar."

TABLE V-5a (Excluding PCS Extension)
I-280 TRANSFER CONCEPT FUND SHORTFALL
(Dollars in Millions)

	83/84	84/85	85/86	86/87	87/88	88/89	89/90	Totals
Alternative II								
Capital Expenditures[1]	$ 1.45	$ 3.76	$ 17.08	$ 26.94	$ 32.59	$ 22.71	$ .21	$104.73
Transfer Concept Fund[2,4]	$ 1.45	$ 3.76	$ 17.08	$ 26.94	$ 32.59	$ 22.66	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ .00	$ .00	$ .05	$ .21	$ .26
Alternative III								
Capital Expenditures	$ 3.01	$ 7.78	$ 37.16	$ 62.60	$ 64.20	$ 66.20	$ 8.01	$248.95
Transfer Concept Fund[4]	$ 3.01	$ 7.78	$ 37.16	$ 56.53	$ .00	$ .00	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ 6.07	$ 64.20	$ 66.20	$ 8.01	$144.48
Alternative IV								
Capital Expenditures	$ 2.76	$ 7.15	$ 48.23	$ 77.10	$ 84.06	$ 67.55	$ 7.62	$294.47
Transfer Concept Fund[4]	$ 2.76	$ 7.15	$ 48.23	$ 46.33	$ .00	$ .00	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ 30.77	$ 84.06	$ 67.55	$ 7.62	$190.00
Alternative IVA								
Capital Expenditures	$ 2.78	$ 7.21	$ 48.05	$ 77.54	$ 83.64	$ 66.50	$ 8.09	$293.81
Transfer Concept Fund[4]	$ 2.78	$ 7.21	$ 48.05	$ 46.43	$ .00	$ .00	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ 31.11	$ 83.64	$ 66.50	$ 8.09	$189.34
Alternative V								
Capital Expenditures	$ 3.46	$ 8.99	$ 42.50	$ 68.51	$ 71.70	$ 77.16	$15.44	$287.76
Transfer Concept Fund[4]	$ 3.46	$ 8.99	$ 42.50	$ 49.52	$ .00	$ .00	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ 18.99	$ 71.70	$ 77.16	$15.44	$183.29
Alternative VA								
Capital Expenditures	$ 3.47	$ 8.93	$ 42.50	$ 67.44	$ 69.59	$ 47.12	$14.77	$253.83
Transfer Concept Fund[4]	$ 3.47	$ 8.93	$ 42.50	$ 49.56	$ .00	$ .00	$ .00	$104.47
Balance[3]	$ .00	$ .00	$ .00	$ 17.88	$ 69.59	$ 47.12	$14.77	$149.36
Alternative VI								
Capital Expenditures	$ 2.62	$ 6.78	$ 53.64	$ 49.21	$ 58.34	$ 31.38	$ 7.17	$209.16
Transfer Concept Fund[4]	$ 2.62	$ 6.78	$ 53.64	$ 41.42	$ .00	$ .00	$ .00	$104.47
Balance	$ .00	$ .00	$ 18.56	$ 7.79	$ 58.34	$ 31.38	$ 7.17	$104.68

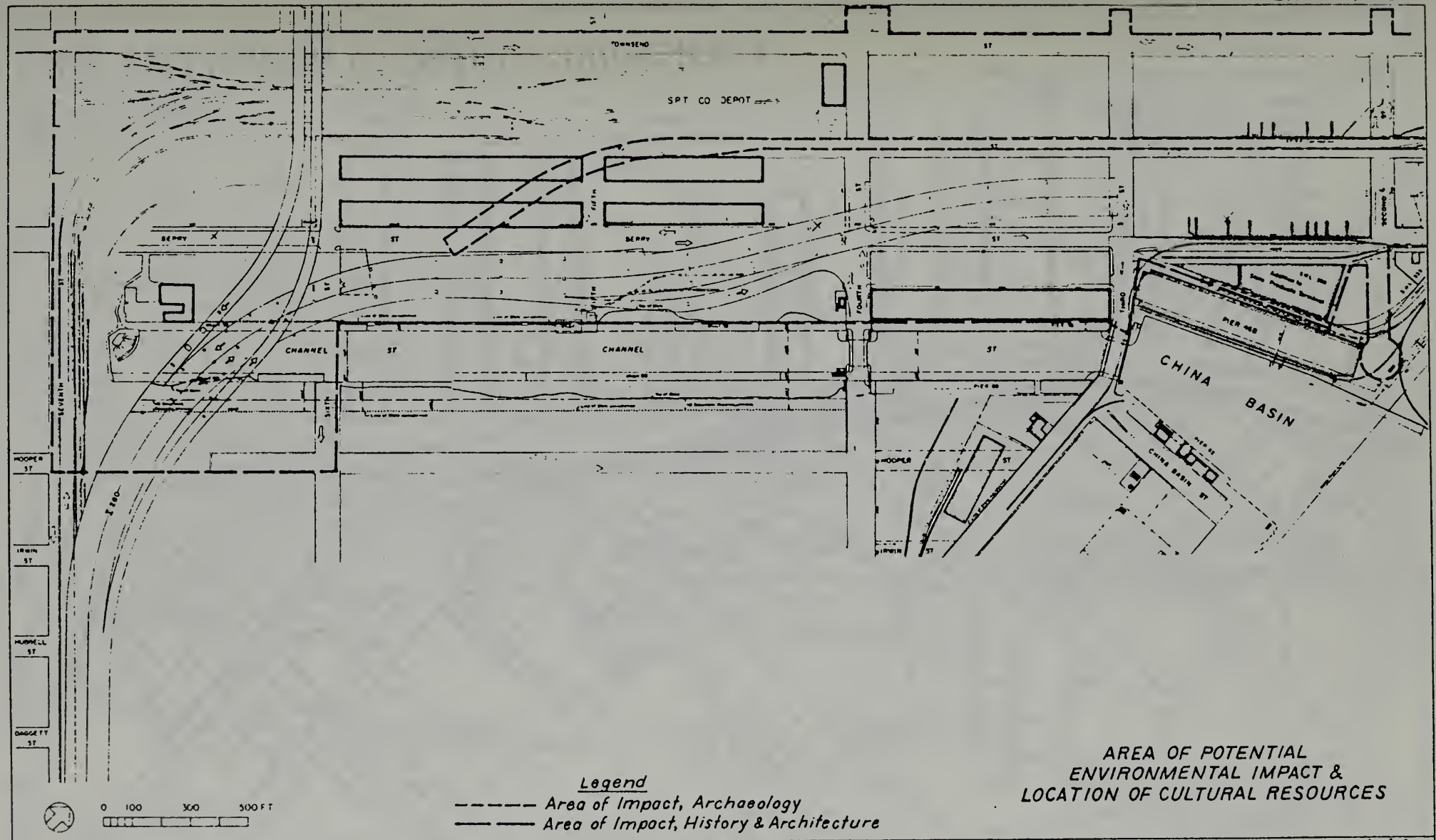
[1] Capital expenditures inflated 8% per year.

[2] Based on total amount of $104.470 including local 15% match.

[3] Assumes both Embarcadero Freeway removal and pullback of I-280 would be eligible for Transfer Concept funding and no federal payback would be required. In either case, the totals in this table would not be affected since the cost of these elements is well below the balances for the appropriate alternatives.

[4] Assumed available in each year for the purpose of funding analysis, actual funds available may vary with Congressional apportionment for each year.

DEIR Page	Revisions
VI-2	In the first paragraph, the following sentence is inserted between the first and second sentences: "The accompanying maps (Exhibits 2A-2F) show the APEI boundaries for the proposed alternatives."
Between VI-2 and VI-3	The APEI maps shown on the following pages of this Addendum are inserted into the DEIR between pages VI-2 and VI-3.
VI-3	The gap in the graphic symbol for Belt Line between Howard Street and Broadway is connected.
VI-4	In the last paragraph, the following sentence is added following the paragraph heading: Potential impacts to this potential Historic District are discussed in terms of the impacts on the qualities of affected buildings which make them potentially eligible for the National Register, although the District as a whole may have qualities beyond those of the constituent buildings.
Between VI-12 and VI-13	The following text and accompanying exhibit are inserted into the DEIR between pages VI-12 and VI-13: Northeast Waterfront Historic District. Not included in Table VI-1 is a City Historic District, called the Northeast Waterfront Historic District (see the accompanying Exhibit 1 for District boundaries). This District has been identified in an Addendum to the Historic Properties Survey Report[11] as potentially eligible for the National Register of Historic Places. Caltrans delineated the boundary of the District according to criteria of functional integrity necessary for eligibility for the National Register. The Caltrans boundary for the District therefore differs slightly from the designated boundary of the City Historic District (Exhibit 1). The SHPO has concurred with the findings of the Adendum to the Historic Properties Survey Report. The Northeast Waterfront District is comprised of approximately eight blocks of commercial warehouse and industrial buildings representing every era of San Francisco's industrial development from the Gold Rush era to the early twentieth century and is potentially eligible under National Register criteria A and C. One



Legend

Area of Impact, Archaeology

Area of Impact, History & Architecture

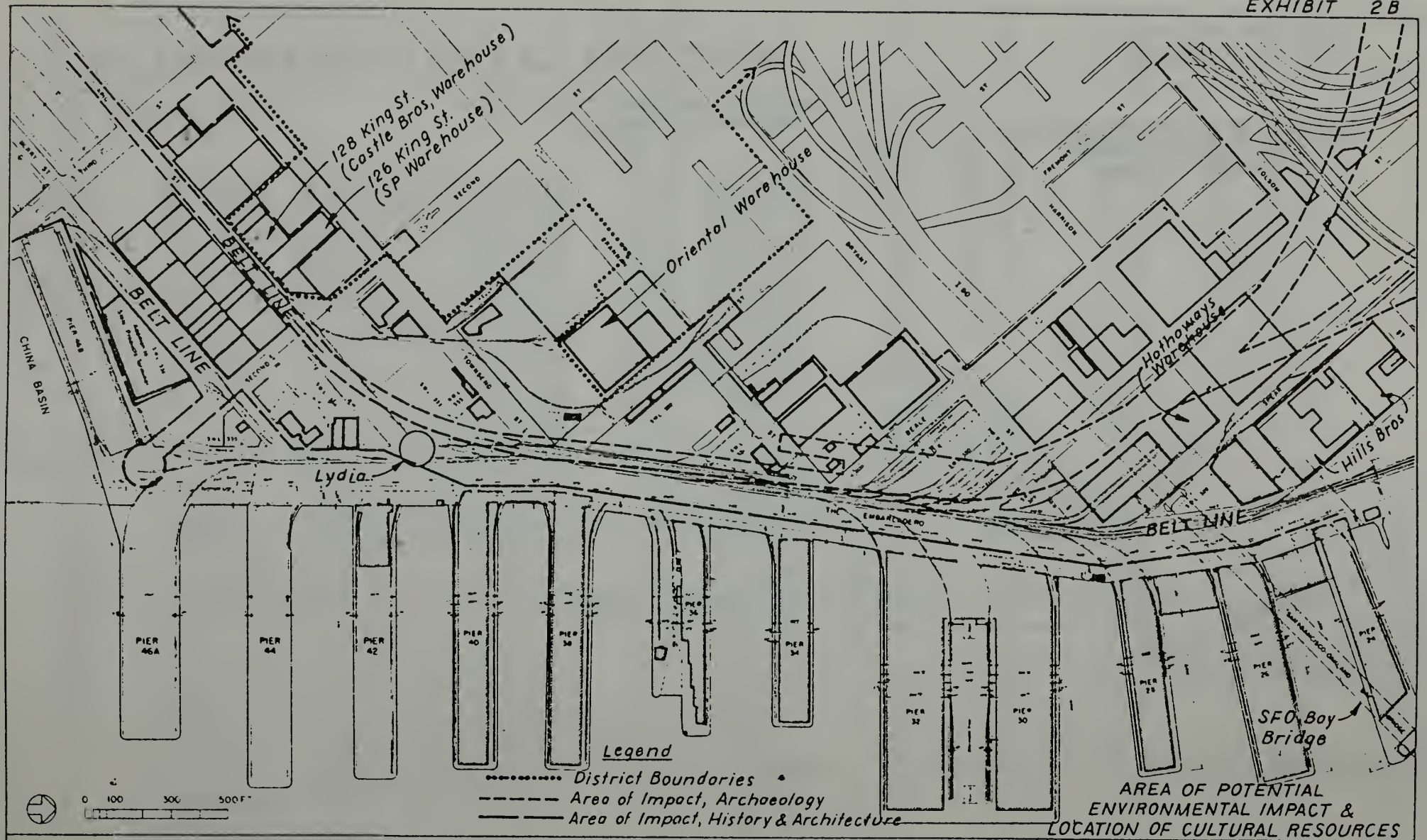
AREA OF POTENTIAL ENVIRONMENTAL IMPACT & LOCATION OF CULTURAL RESOURCES

1 of 6

I-280 TRANSFER CONCEPT PROGRAM

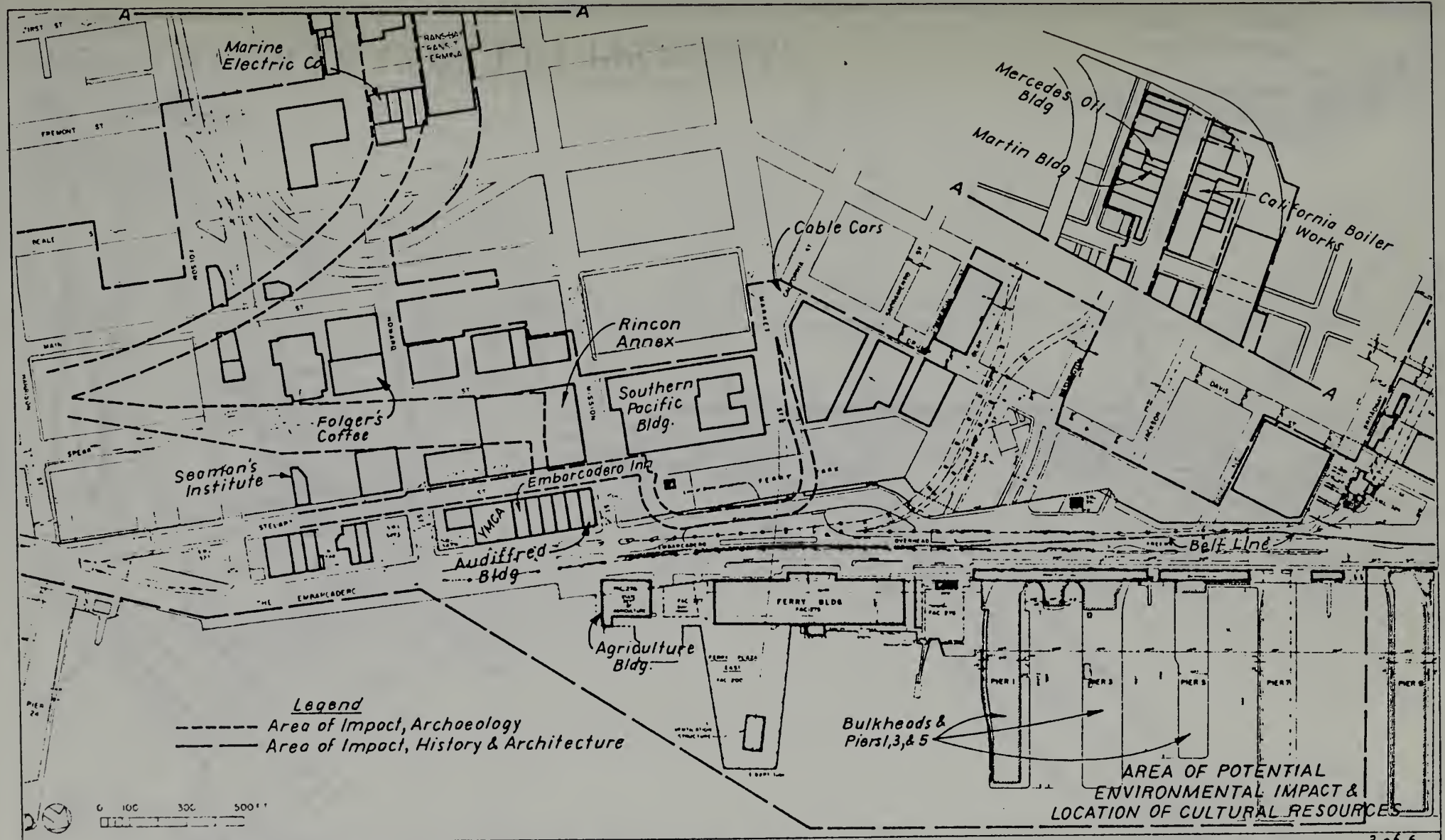
ALTERNATIVE
China Basin Segment

4-83



I-280 TRANSFER CONCEPT PROGRAM

ALTERNATIVE
South Beach Rincon Hill Segment
4-83

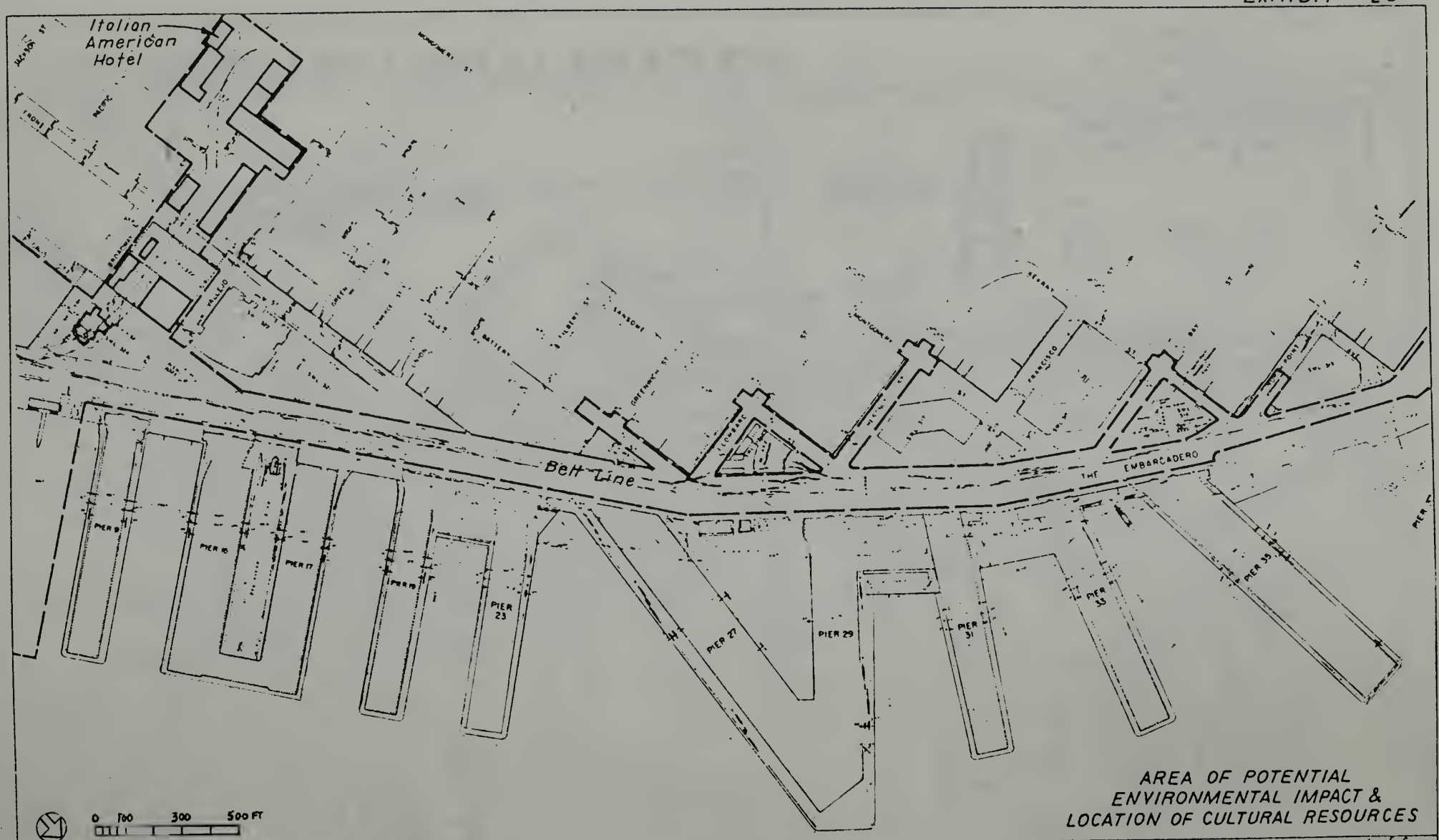


3 of 6

I-280 TRANSFER CONCEPT PROGRAM

ALTERNATIVE
Ferry Building Area Segment

4-83



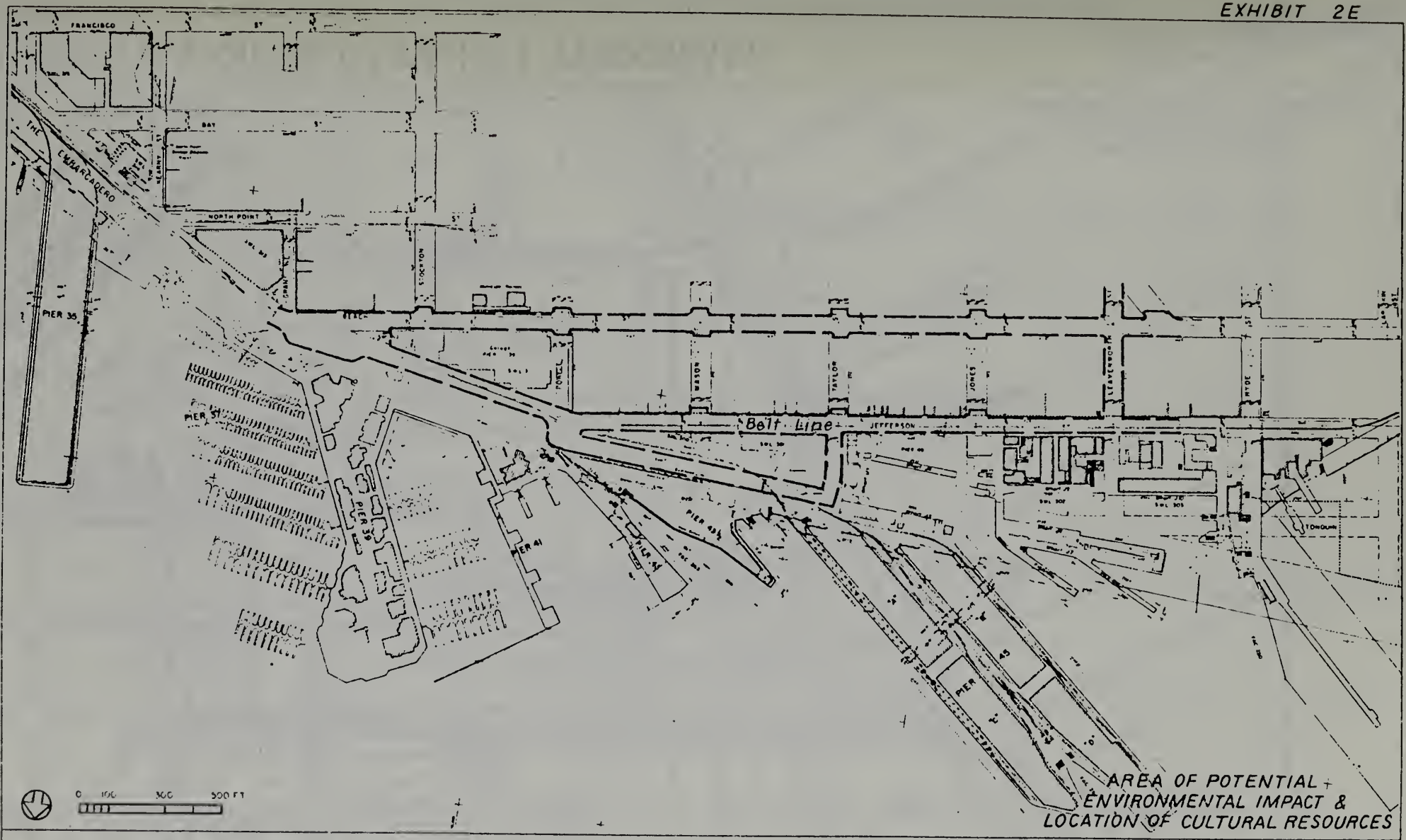
4 of 6

I-280 TRANSFER CONCEPT PROGRAM

ALTERNATIVE
Piers 9-35 Segment

4-83

EXHIBIT 2E



AREA OF POTENTIAL ENVIRONMENTAL IMPACT & LOCATION OF CULTURAL RESOURCES

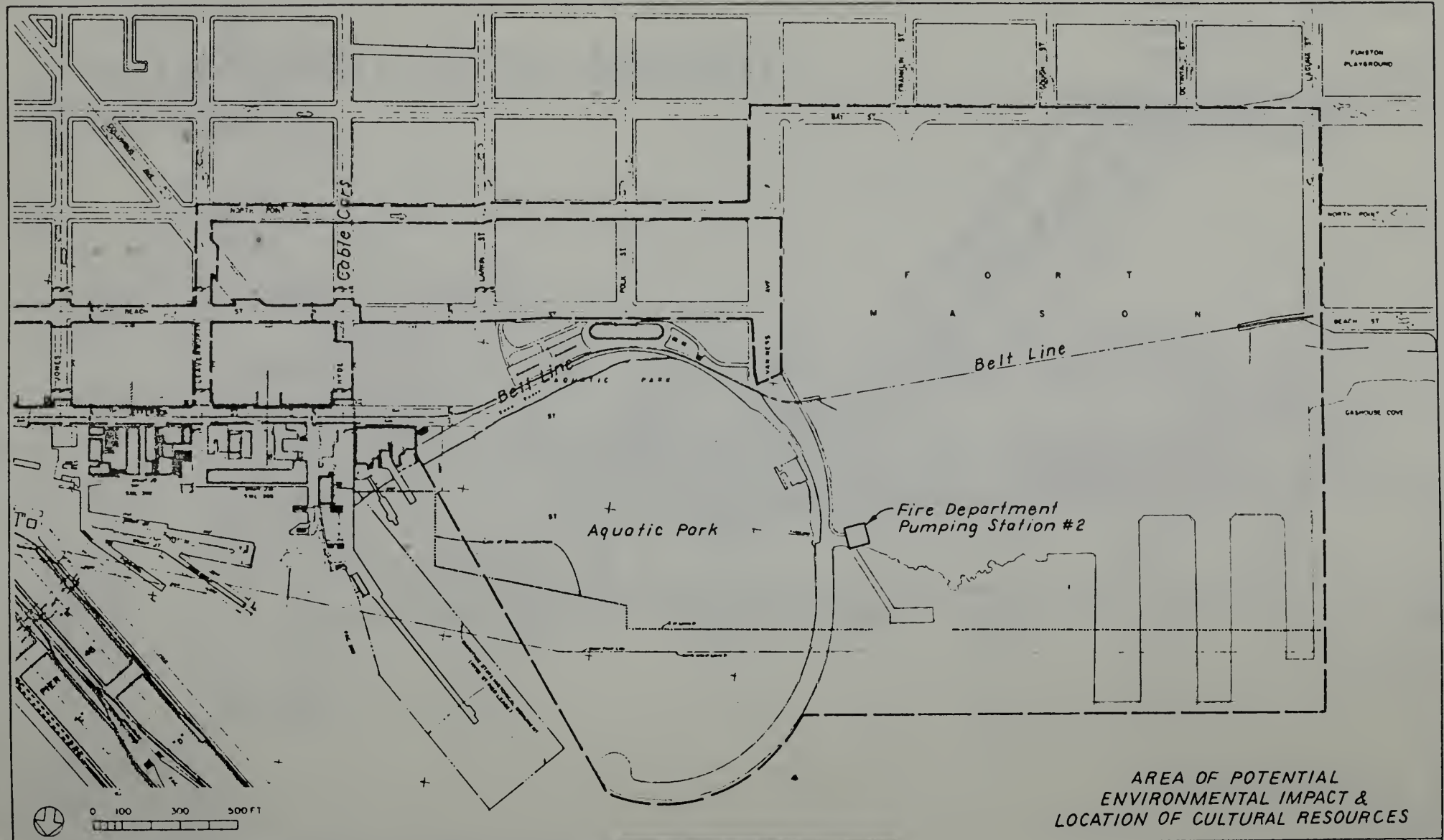
5 of 6

I-280 TRANSFER CONCEPT PROGRAM

ALTERNATIVE
Fisherman's Wharf Segment

4-83

EXHIBIT 2F



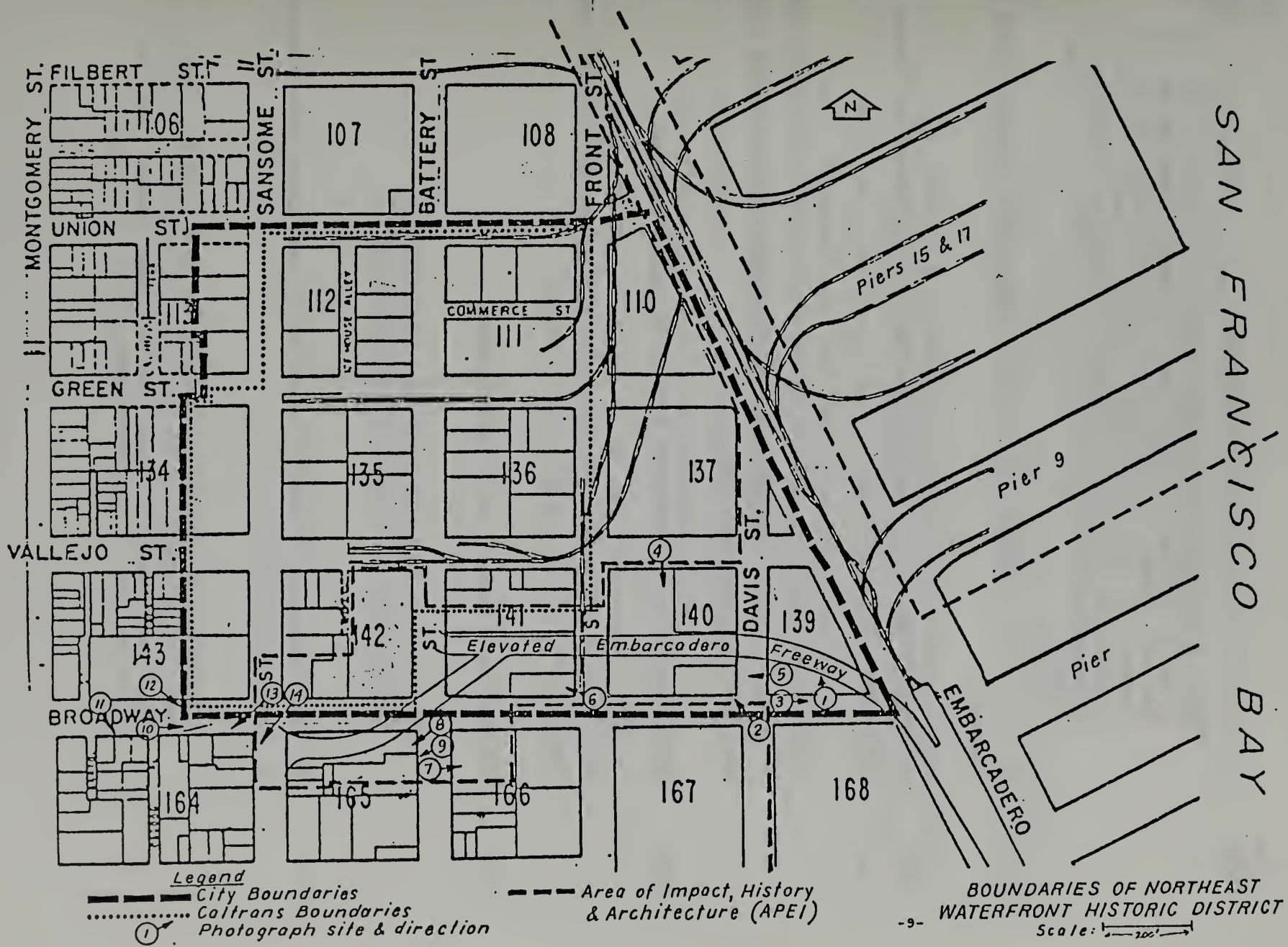
AREA OF POTENTIAL
ENVIRONMENTAL IMPACT &
LOCATION OF CULTURAL RESOURCES

6 of 6

I-280 TRANSFER CONCEPT PROGRAM

ALTERNATIVE
Fort Mason/Aquatic Park Segment
4-83

EXHIBIT I


FILBERT ST.
MONTGOMERY ST.
SANSOME ST.
BATTERY ST.
FRONT ST.
UNION ST.
GREEN ST.
VALLEJO ST.
BROADWAY
COMMERCE ST
ST. MARY'S ALLEY
DAVIS ST.
106
107
108
110
111
112
113
134
135
136
137
139
140
141
142
143
164
165
166
167
168
Piers 15 & 17
Pier 9
Pier
Elevated Embarcadero Freeway
EMBARCADERO
SAN FRANCISCO BAY
N
Legend
City Boundaries
Caltrans Boundaries
Photograph site & direction
Area of Impact, History & Architecture (APE)
BOUNDARIES OF NORTHEAST WATERFRONT HISTORIC DISTRICT
Scale: 200'

DEIR Page	Revisions

block of the potentially eligible District overlaps the APEI for the project at the corner of Broadway and Battery Street (Exhibit 1). The only effect on the District by any alternative will be the removal of the Embarcadero Freeway Broadway off-ramp (Alternatives III-VA). The removal of the off-ramp is considered a beneficial effect, since it will restore the District to its original setting.

VI-16 On line 4 of the first paragraph, the words "public rowing" are substituted for "private".

VI-20 On line 3 of the third full paragraph, after the word "Plaza" add "(known as Embarcadero Park)."

The following sentence is added to the end of the third full paragraph: "Both Justin Herman Plaza and Embarcadero Park are under the jurisdiction of the Recreation and Park Department."

VI-23 On line 7 of the second paragraph, the word "proposed" is deleted.

On line 10 of the second paragraph, after the phrase "on the site" insert "except for the ILWU building at 4 Berry Street,".

VI-39 The following is added to the list of references:

[11] Caltrans District 4 Environmental Analysis Branch, Addendum No. 1, Historic Properties Survey Report January, 1984.

VII-14 The following paragraph is inserted after the first partial paragraph and before "2. Relationship to Plans:"

Development and construction impacts that take place on property under the jurisdiction of the San Francisco Recreation and Park Department, such as Aquatic Park or Justin Herman Plaza, are subject to approval by the Recreation and Park Commission.

DEIR Page	Revisions
XI-2	The following name and project responsibility are added to Parsons Brinckerhoff Quade & Douglas, Inc. key personnel: "William H. Lathrop: Principal-In-Charge"
XI-3	The following information is inserted between "ROMA" and "Aileen C. Hernandez Associates": "Page, Anderson & Turnbull, Inc., San Francisco, California. Subconsultants to ROMA, responsible for identifying and assessing potential impacts of alternative actions on significant historic and architectural resources located within the project area. Key personnel and their titles include: Robert Bruce Anderson: Project Manager Jack W. Schafer: Architectural Conservator Woodruff Minor: Architectural Historian
A-52	The gap in the graphic symbol for Belt Line between Howard Street and Broadway is connected.